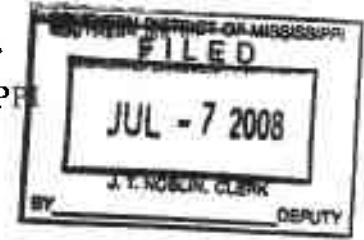


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *1:08 CR 84 H 50-RHW*

BEATRICE E. MOSES and
LEVERNE MOSES

18 U.S.C. § 287
18 U.S.C. § 1001
18 U.S.C. § 641
18 U.S.C. § 1341

The Grand Jury charges:

COUNT 1

On or about September 12, 2005, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, the Defendant, **BEATRICE E. MOSES**, aided and abetted by others known and unknown to the Grand Jury, made and presented to the Federal Emergency Management Agency a claim against the United States for payment, which she knew to be false, fictitious, and fraudulent, by filing a disaster assistance claim in which she represented that at the time of Hurricane Katrina she was living in the home at 8708 Barnacle Boulevard, Ocean Springs, Mississippi.

In violation of Sections 287 and 2, Title 18, United States Code.

COUNT 2

On or about October 21, 2005, in Jackson County in the Southern Division of the Southern

District of Mississippi and elsewhere, in a matter within the jurisdiction of the Federal Emergency Management Agency, an agency of the United States of America, the defendant, **BEATRICE E. MOSES**, aided and abetted by others known and unknown to the Grand Jury, knowingly and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendant sent a letter in which she represented that her primary residence was 8708 Barnacle Boulevard, Ocean Springs, Mississippi, when in truth and in fact her primary residence at the time of Hurricane Katrina was not 8708 Barnacle Boulevard, Ocean Springs, Mississippi.

In violation of Sections 1001 and 2, Title 18, United States Code.

COUNT 3

On or about October 4, 2005, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, in a matter within the jurisdiction of the Small Business Administration, an agency of the United States of America, the defendants, **BEATRICE E. MOSES and LEVERNE MOSES**, aided and abetted by others known and unknown to the Grand Jury, knowingly and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendants signed an application for disaster loan benefits in which they represented that their primary residence was 8708 Barnacle Boulevard, Ocean Springs, Mississippi, when in truth and in fact their primary residence at the time of Hurricane Katrina was not 8708 Barnacle Boulevard, Ocean Springs, Mississippi.

In violation of Sections 1001 and 2, Title 18, United States Code.

COUNT 4

On or about July 11, 2006, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, in a matter within the jurisdiction of the Department of Housing and Urban Development, an agency of the United States of America, the defendant,

BEATRICE E. MOSES, aided and abetted by others known and unknown to the Grand Jury, knowingly and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendant filed a homeowner's assistance grant application with the Mississippi Development Authority in which she represented that her primary residence was 8708 Barnacle Boulevard, Ocean Springs, Mississippi, when in truth and in fact her primary residence at the time of Hurricane Katrina was not 8708 Barnacle Boulevard, Ocean Springs, Mississippi.

In violation of Sections 1001 and 2, Title 18, United States Code.

COUNT 5

On or about August 6, 2007, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, in a matter within the jurisdiction of the Department of Housing and Urban Development, an agency of the United States of America, the defendant, **BEATRICE E. MOSES**, aided and abetted by others known and unknown to the Grand Jury, knowingly and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendant signed an occupant/primary residence affidavit with the Mississippi Development Authority in which she represented that her primary residence was 8708 Barnacle Boulevard, Ocean Springs, Mississippi, when in truth and in fact her primary residence at the time of Hurricane Katrina was not 8708 Barnacle Boulevard, Ocean Springs, Mississippi.

In violation of Sections 1001 and 2, Title 18, United States Code.

COUNT 6

From on or about September 12, 2005, through on or about February 1, 2006, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **BEATRICE E. MOSES**, did steal, purloin and knowingly convert to her own use or the use of another greater than \$1,000 in funds belonging to the United States of America by receiving

Hurricane Katrina disaster relief benefits from the Federal Emergency Management Agency, such benefits being funded by the United States Department of Homeland Security, to which she knew she was not entitled.

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

COUNT 7-10

1. From on or about September 12, 2005, through on or about February 1, 2006, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **BEATRICE E. MOSES**, aided and abetted by others known and unknown to the Grand Jury, intentionally devised and carried out a scheme to defraud the Federal Emergency Management Agency, an agency of the United States, to obtain money and property by means of materially false and fraudulent representations, pretenses and promises, and in furtherance thereof, did use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

2. On or about September 12, 2005, through on or about February 1, 2006, within the Southern District of Mississippi and elsewhere, the defendant, **BEATRICE E. MOSES**, aided and abetted by others known and unknown to the Grand Jury, for the purpose of carrying out this scheme to defraud and attempting to do so, knowingly caused to be sent or delivered by the United States Postal Service certain items, each item constituting a separate count herein as follows:

COUNT 7 - Disaster Assistance Check, \$2,000, November 16, 2005

COUNT 8 - Disaster Assistance Check, \$2,358, November 29, 2005

COUNT 9 - Disaster Assistance Check, \$5,200, December 14, 2005

COUNT 10 - Disaster Assistance Check, \$15,221.60, January 4, 2006

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 11

On or about September 27, 2005, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, in a matter within the jurisdiction of the United States Department of Agriculture, an agency of the United States of America, the defendant, **BEATRICE E. MOSES**, aided and abetted by others known and unknown to the Grand Jury, knowingly and willfully made or caused to be made a false and fraudulent material statement or representation, in that the defendant filed a disaster assistance claim in which she represented that at the time of Hurricane Katrina, she was living at 8708 Barnacle Boulevard, Moss Point, Mississippi, when in truth and in fact at the time of Hurricane Katrina she was not living at 8708 Barnacle Boulevard, Moss Point, Mississippi.

In violation of Section 1001 and 2, Title 18, United States Code.

NOTICE OF FORFEITURE

As a result of the felony offenses specified in Counts 6 and 7 through 10 of this Indictment, the defendant, **BEATRICE E. MOSES**, shall forfeit to the United States, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations.

Further, if any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon 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,

then it is the intent of the United States, pursuant to Section 853(p), Title 21, United States Code, to seek a judgment of forfeiture of any other property of the defendant up to the value of the property described in this indictment or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code; Section 2461(c), Title 28, United States Code; and Section 119, Title 41, United States Code.


for DUNN LAMPTON
United States Attorney

A TRUE BILL:

s/signature redacted

Foreperson of the Grand Jury

CRIMINAL CASE COVER SHEET
U.S. District Court, Southern District of Mississippi

1:08CR84H50-RAW

PLACE OF OFFENSE:

RELATED CASE INFORMATION:

CITY: OCEAN SPRINGS

SUPERSEDING INDICIMENT _____ DOCKET # _____

COUNTY: JACKSON

SAME DEFENDANT _____ NEW DEFENDANT X

MAGISTRATE JUDGE CASE NUMBER: _____

SEARCH WARRANT CASE NUMBER _____

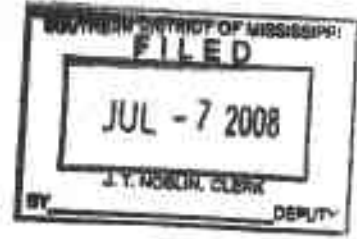
R 20/ R 40 FROM DISTRICT OF _____

DEFENDANT INFORMATION:

JUVENILE: _____ YES X _____ NO

MATTER TO BE SEALED: _____ YES X _____ NO

NAME/ALIAS: BEATRICE E. MOSES



U.S. ATTORNEY INFORMATION:

AUSA ANNETTE WILLIAMS BAR # 9641

INTERPRETER: X NO _____ YES LIST LANGUAGE AND/OR DIALECT:

LOCATION STATUS: ARREST DATE _____

- _____ ALREADY IN FEDERAL CUSTODY AS OF (_____)
- _____ ALREADY IN STATE CUSTODY
- _____ ON PRETRIAL RELEASE

U.S.C. CITATIONS

TOTAL # OF COUNTS: 11 _____ PETTY _____ MISDEMEANOR X FELONY

INDEX KEY/CODE (CLERK'S OFFICE USE ONLY)	DESCRIPTION OF OFFENSE CHARGED	COUNT (s)
SET 1 <u>18:287.F</u>	<u>FALSE OR FRAUDULENT CLAIMS</u>	<u>1</u>
SET 2 <u>18:1001.F</u>	<u>FALSE STATEMENTS</u>	<u>2-5, 11</u>
SET 3 <u>18:641.F</u>	<u>THEFT OF GOVERNMENT PROPERTY OR FUNDS</u>	<u>6</u>
SET 4 <u>18:1341.F</u>	<u>MAIL FRAUD</u>	<u>7-10</u>
SET 5 _____	_____	_____

(MAY BE CONTINUED ON REVERSE)

DATE: 7/1/08

SIGNATURE OF AUSA: Annette Williams

DISTRICT COURT CASE NUMBER (TO BE FILLED IN BY DEPUTY CLERK): _____

CRIMINAL CASE COVER SHEET
U.S. District Court, Southern District of Mississippi

1:08CR84H50-RAW

PLACE OF OFFENSE:

RELATED CASE INFORMATION:

CITY: OCEAN SPRINGS

SUPERSEDING INDICTMENT _____ DOCKET # _____

COUNTY: JACKSON

SAME DEFENDANT _____ NEW DEFENDANT X

MAGISTRATE JUDGE CASE NUMBER: _____

SEARCH WARRANT CASE NUMBER _____

R 20/ R 40 FROM DISTRICT OF _____

DEFENDANT INFORMATION:

JUVENILE: _____ YES X _____ NO

MATTER TO BE SEALED: _____ YES X _____ NO

NAME/ALIAS: LEVERNE MOSES

U.S. ATTORNEY INFORMATION:

AUSA ANNETTE WILLIAMS BAR # 9641

INTERPRETER: X NO _____ YES LIST LANGUAGE AND/OR DIALECT:

LOCATION STATUS: ARREST DATE _____

_____ ALREADY IN FEDERAL CUSTODY AS OF (_____)

_____ ALREADY IN STATE CUSTODY

_____ ON PRETRIAL RELEASE

U.S.C. CITATIONS

TOTAL # OF COUNTS: 1 _____ PETTY _____ MISDEMEANOR X FELONY

<u>INDEX KEY/CODE</u> (CLERK'S OFFICE USE ONLY)	<u>DESCRIPTION OF OFFENSE CHARGED</u>	<u>COUNT (S)</u>
SET 1 <u>18:1001.F</u>	<u>FALSE STATEMENTS</u>	<u>3</u>
SET 2 _____	_____	_____
SET 3 _____	_____	_____
SET 4 _____	_____	_____
SET 5 _____	_____	_____

(MAY BE CONTINUED ON REVERSE)

DATE: 7/1/08

SIGNATURE OF AUSA: Annette Williams

DISTRICT COURT CASE NUMBER (TO BE FILLED IN BY DEPUTY CLERK): _____

