UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 10-37

v. * SECTION: "R"

SONJA T. JONES *

* * *

FACTUAL BASIS

If this case were called for trial, the Government would be prepared to prove, using documentary evidence maintained by the Federal Emergency Management Administration, Social Security Administration, banks in the Southern District of Georgia and elsewhere, property records in parishes of Louisiana and counties of Texas, telephone records, property leases, driver's license records, and United States Treasury records of disbursements by check, and others, together with the testimony of employees and former employees of FEMA, lay witnesses in Louisiana and the Southern District of Georgia, and agents of the Secret Service, and Department of Homeland Security Office of Inspection General, the following facts:

Hurricane Katrina in Louisiana (Disaster 1603) and Hurricane Rita in Texas (Disaster 1606) and Louisiana (Disaster 1607) were Presidentially declared major disasters in August and September of 2005. The Federal Emergency Management Administration (FEMA), an agency of the Department of Homeland Security, a department of the executive branch of the United States, was charged with making available disaster relief funds to provide temporary housing and other

relief to persons whose primary residences were severely damaged or destroyed as a direct affect of Hurricanes Katrina and Rita. A person displaced or who had suffered damage to his/her primary residence could receive \$2,000.00 in immediate expedited assistance, up to \$5,200.00 in housing repair assistance, up to \$10,500.00 to assist in housing replacement, and up to \$26,200.00 over the 18 months following the disaster to secure temporary housing.

To open a disaster relief case and to apply for disaster relief benefits, a person who had been displaced or who had suffered property loss needed only to report their loss by telephone to FEMA representatives and request assistance. Because of the emergency nature of the disasters and the immediate need to provide displaced persons with access to alternative housing, FEMA responded to applications for relief before verifying or substantiating the information provided by the person requesting disaster assistance funds. An applicant for disaster relief funds was required to provide a FEMA representative with his or her name, social security number, telephone numbers, the address of the damaged property, information about the nature and cause of the damage, any insurance, and information about the applicant's current address and income. This information was entered on an Application/Registration for Disaster Assistance, and mailed as confirmation to the applicant, together with information about available disaster relief programs. Immediate expedited assistance funds, in the form of a government check for \$2,000.00, would be sent to the applicant pending further assistance based on follow-up information to be provided by the applicant.

Between September 15 and November 22, 2005, **SONJA T. JONES**, using her own name but property addresses and social security numbers not her own, made over twenty applications for Hurricane Katrina and Hurricane Rita disaster relief funds from FEMA, upon the

fictitious and fraudulent claims that she was in need of assistance for temporary housing because her primary residence had been damaged or destroyed by the hurricanes and flooding, when in truth and in fact she had never been a resident at the property addresses she claimed, many of which did not in fact exist, and she had neither been displaced by the disasters nor suffered any property damage in the manner in which she claimed.

By these means **SONJA T. JONES** caused the mailing of sixteen expedited emergency relief checks, one rental assistance check, and one housing replacement check from FEMA to her temporary addresses in Dublin, Georgia, which she then deposited into and withdrew cash from accounts in the State Bank of Cochran and First Laurens Bank in Dublin, Georgia, totaling \$41,216.00 in United States Treasury funds to which she was not entitled. In making such false applications for relief, **SONJA T. JONES** also mailed or caused to be mailed applications, requests for verification, and fictitious and counterfeited records of rentals of residence premises.

SONJA T. JONES was located in Dublin, Georgia on March 26, 2006, and interviewed by Special Agent Alan Malone of the United States Secret Service. She admitted to having filed multiple claims for disaster relief for property addresses not her own, using the social security numbers of friends and family.

located until her recent arr	est in Louisiana.		
READ AND APPROVE	<u>D</u> :		
VALERIE JUSSELIN Counsel for Defendant	(Date)	SHARAN E. LIEBERMAN Assistant U.S. Attorney	(Date)
SONJA T. JONES	(Date)		

Defendant

The instant indictment was returned on February 4, 2009. SONJA T. JONES was not