UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION



UNITED STATES OF AMERICA

v.

CASE NO. 3:18-cr- 47-J-390 RL 18 U.S.C. § 641

18 U.S.C. § 287

DELTRA LONG

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on or about November 5, 2016, and continuing through on or about April 21, 2017, in the Middle District of Florida and elsewhere,

DELTRA LONG,

did knowingly and willfully embezzle, steal, purloin, and convert to the defendant's use and the use of another, more than \$1,000 of money and a thing of value of the United States and the Federal Emergency Management Agency, a department and agency of the United States, that is, disaster assistance benefits, with intent to deprive the United States and the Federal Emergency Management Agency of the use and benefit of the money and thing of value.

In violation of 18 U.S.C. § 641.

COUNT TWO

On or about November 5, 2016, in the Middle District of Florida, and elsewhere, the defendant,

DELTRA LONG.

did knowingly make and present to a department and agency of the United States, that is, the Federal Emergency Management Agency, a claim upon and against the United States and the Federal Emergency Management Agency that was based upon a false and fraudulent material fact, that is, an application for assistance from the Federal Emergency Management Agency's Individuals and Households Program for Hurricane Matthew in which the defendant falsely represented the address of her primary residence, when, in truth and in fact, the defendant knew such claim to be false, fictitious, and fraudulent because the residence identified in the application was not the defendant's primary residence.

In violation of 18 U.S.C. § 287.

FORFEITURES

1. The allegations contained in Count One of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

- 2. Upon conviction of a violation of 18 U.S.C. § 641, the defendant, DELTRA LONG, shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.
- 3. The property to be forfeited includes, but is not limited to, the sum of at least \$10,022.36, which represents the proceeds of the offense.
- 4. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

Foreperson

MARIA CHAPA LOPEZ United States Attorney

Jay Taylor

ssistant United States Attorney

By:

Kelly Karase

Assistant United States Attorney
Deputy Chief, Jacksonville Division

UNITED STATES DISTRICT COURT

Middle District of Florida Jacksonville Division

THE UNITED STATES OF AMERICA

VS.

DELTRA LONG

INDICTMENT

Violations: Ct. 1: 18 U.S.C. § 641

Ct. 2: 18 U.S.C. § 287

Foreperson

A true bill,

Filed in open court this 19th day

of April, 2018.

Bail \$_____