

1. From at least in or around April 2020 up to and including in or around July 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of

executing such scheme and artifice, and aided and abetted the same, to wit, the defendants defrauded New York City's COVID-19 Hotel Room Isolation Program (the "Program") -- which was intended to provide hotel rooms, free of cost, for patients convalescing from COVID-19 and for healthcare workers who needed to self-isolate because of exposure to COVID-19 -- by falsely claiming to be healthcare workers, by misappropriating actual healthcare workers' identifying information, and by selling these hotel rooms to those who did not meet the Program's requirements, and sent and received interstate wires to and from the Southern District of New York, and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The Grand Jury further charges:

2. From at least in or around April 2020 up to and including in or around July 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, and others known and unknown, willfully and knowingly, combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

3. It was a part and an object of the conspiracy that CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, the defendants defrauded the Program by falsely claiming to be healthcare workers, by misappropriating actual healthcare workers' identifying information, and by selling these hotel rooms to those who did not meet the Program's requirements, and sent and received interstate wires to and from the Southern District of New York, and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Honest Services Fraud)

The Grand Jury further charges:

4. From at least in or around May 2020 up to and including in or around June 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, having devised and intending to devise a scheme and artifice to defraud, and to deprive her employer -- a call center in New York City ("Call Center-1") that handled phone calls and certain reservations for the Program -- of its intangible right to her honest services, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice to defraud, and aided and abetted the same, to wit, using online accounts, LEWIS abused her employment at Call Center-1 to secure Program hotel rooms for non-qualifying individuals in exchange for payment, and LEWIS sold healthcare workers' personal identifying information -- to which she had access by virtue of her employment at Call Center-1 -- to co-conspirators in exchange for a fee, in order to abuse and profit from the Program, and sent and received interstate wires to and from the Southern District of New York, and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343, 1346, and 2.)

COUNT FOUR
(Aggravated Identity Theft)

The Grand Jury further charges:

5. From at least in or around May 2020 up to and including in or around July 2020, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," and TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, LEWIS and BENJAMIN transferred, possessed, used, and aided and abetted the transfer, possession, and use of, the names and other personal identification information of healthcare workers in the course of committing the wire fraud offenses charged in Counts One and Two of this Indictment.

(Title 18, United States Code, Sections 1028A and 2.)

COUNT FIVE
**(Theft of Government Money, Property, or Records through
Unemployment Benefits Fraud)**

The Grand Jury further charges:

6. From in or around November 2020 up to and including in or around September 2021, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, embezzled, stole, purloined, and converted to her own use and the

use of another, and without authority, sold, conveyed, and disposed of records, vouchers, money, and things of value of the United States and a department and agency thereof, to wit, the United States Department of Labor, which exceeded the sum of \$1,000, and received, concealed, and retained the same with intent to convert it to her use and gain, knowing it to have been embezzled, stolen, purloined, and converted, to wit, LEWIS secured a total of more than \$45,000 in federally funded unemployment benefits by claiming falsely that she had not been employed since February 2020 due to a lack of work because of the COVID-19 pandemic, when in truth and fact, LEWIS was employed for at least some of that period at Call Center-1, and LEWIS's employment there ceased not because of the COVID-19 pandemic but because LEWIS stopped showing up to work in or around June 2020.

(Title 18, United States Code, Section 641.)

FORFEITURE ALLEGATIONS

7. As the result of committing the offenses charged in Counts One and Two of this Indictment, CHANETTE LEWIS, a/k/a "Netty Hott," TATIANA BENJAMIN, a/k/a "Ta Banks," a/k/a "Lyric Muvaa," TATIANA DANIEL, a/k/a "Kimora Daniel," and HEAVEN WEST, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable

to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

8. As the result of committing the offenses charged in Count Three and Five of this Indictment, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON

/s/
DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CHANETTE LEWIS,
a/k/a "Netty Hott,"
TATIANA BENJAMIN,
a/k/a "Ta Banks,"
a/k/a "Lyric Muva,"
TATIANA DANIEL,
a/k/a "Kimora Daniel," and
HEAVEN WEST,

Defendants.

INDICTMENT

21 Cr. ()

(18 U.S.C. §§ 1343, 1349, 1346,
1028A, 641, and 2.)

DAMIAN WILLIAMS
United States Attorney

Barry G. Gell
Foreperson

12/1/21

Filed Indictment
case assigned to Judge Kaplan

USMJ Freeman
MG