

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
CHANETTE LEWIS, :
a/k/a "Netty Hott," :
:
Defendant. :
:
- - - - - X

SUPERSEDING INFORMATION

S2 21 Cr. 729 (LAK)

COUNT ONE
(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or around April 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, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, and others known and unknown, 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, LEWIS agreed with others to commit COVID-19 pandemic fraud by: (a) defrauding 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 a healthcare worker, by misappropriating actual healthcare workers' identifying information, and by selling Program hotel rooms that LEWIS fraudulently obtained to individuals who did not meet the Program's requirements; and (b) committing unemployment benefits fraud in New York State by fraudulently obtaining such benefits for herself and by stealing the identity of another individual and obtaining unemployment benefits issued for the benefit of that individual; and LEWIS sent and received, and caused others to send and receive, interstate text messages and phone calls, to and from the Southern District of New York and elsewhere, in furtherance of this conspiracy.

Overt Acts

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between in or about April 2020 and in or about July 2020, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, obtained approximately 28 nights' worth of Program hotel rooms by falsely claiming to be a healthcare worker.

b. Between in or about April 2020 and in or about July 2020, LEWIS used Facebook to advertise the fraudulent sale of Program hotel rooms, communicate with co-conspirators, and communicate with potential customers. For instance, on or about June 11, 2020, LEWIS wrote, "I'm booking it as u a health care worker". On the same day, LEWIS wrote, "we book for the doctor and health care workers . . . I be stealing they employer id number and license number and stuff."

c. Between in or about April 2020 and in or about July 2020, LEWIS sold approximately 1,936 nights' worth of fraudulently obtained Program hotel rooms to others and received payment via Cash App.

d. Between in or about March 2020 and in or about September 2021, LEWIS fraudulently obtained more than \$46,000 in unemployment benefits in her own name, including by submitting unemployment applications containing material misrepresentations on or about both November 25, 2020 and March 21, 2021.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The United States Attorney further charges:

4. From at least in or around July 2020 up to and including in or around October 2021, in the Southern District of New York and elsewhere, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343.

5. It was a part and object of the conspiracy that CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, and others known and unknown, 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, LEWIS agreed with others to defraud the New York City Housing Authority ("NYCHA") by submitting fabricated documents -- such as purported Orders of Protection bearing Judges' names, purported letters from a District Attorney, and purported letters from

doctors attesting to alleged medical issues -- to NYCHA in order to secure public housing benefits for both herself and others, such as transfers to larger NYCHA apartments; and LEWIS sent and received, and caused others to send and receive, interstate text messages and phone calls, to and from the Southern District of New York and elsewhere, in furtherance of this conspiracy.

Overt Acts

6. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between at least in or about June 2021 and in or about August 2021, CHANETTE LEWIS, a/k/a "Netty Hott," the defendant, used Facebook to advertise the services she offered with respect to NYCHA apartments. For instance, on or about June 15, 2021, LEWIS posted on Facebook and advertised, among other things, a transfer within NYCHA for \$1,300, and an extra room (i.e., a larger apartment within NYCHA housing) for \$1,700.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

7. As the result of committing the offenses charged in Counts One and Two of this Superseding Information, 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 offenses.

Substitute Assets Provision

8. If any of the above-described forfeitable property, 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 person;

c. has been placed beyond the jurisdiction of the Court;

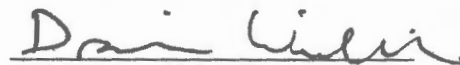
d. has been substantially diminished in value; or

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

defendant 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.)

A handwritten signature in dark ink, appearing to read "Damian Williams", written over a horizontal line.

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,"

Defendant.

SUPERSEDING INFORMATION

S2 21 Cr. 729 (LAK)

(18 U.S.C. § 371)

DAMIAN WILLIAMS
United States Attorney
