



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
JANUARY 2025 GRAND JURY

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOYCE TURNER,  
  
Defendant.

CR 2:25-cr-00254-GW

I N D I C T M E N T

[18 U.S.C. § 1040: Fraud in  
Connection with Major Disaster or  
Emergency Benefits]

The Grand Jury charges:

[18 U.S.C. §§ 1040, 2]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Defendant JOYCE TURNER resided in the Southern District of Texas. Defendant TURNER did not reside in California.

FEMA Benefits for Victims of January 2025 California Wildfires

2. The Federal Emergency Management Agency ("FEMA") was an agency within the United States Department of Homeland Security.

3. On or about January 8, 2025, the President of the United States approved a Major Disaster Declaration for California in response to multiple wildfires within Los Angeles County beginning on or about January 7, 2025 (the "California Wildfires").

1           4.     This declaration was a Presidential Disaster Declaration  
2     (FEMA-4856-DR), effective on or about January 8, 2025, made under  
3     Section 401 of the Robert T. Stafford Disaster Relief and Emergency  
4     Assistance Act.

5           5.     Pursuant to this declaration, FEMA made available financial  
6     assistance and benefits to individuals and families affected by the  
7     California Wildfires ("victims").

8           6.     Victims who suffered losses as a result of the California  
9     Wildfires, including renters who lost personal property and/or the  
10    use of their rental residences, could qualify for FEMA benefits.  
11    Specifically, victims could seek relief for home repair, personal  
12    property damage, transportation, medical expenses, and housing  
13    assistance, among other benefits.

14    B.    THE FRAUDULENT APPLICATION

15           7.     On or about January 9, 2025, in the Central District of  
16    California and elsewhere, defendant TURNER knowingly made and  
17    willfully caused to be made a materially false, fictitious, and  
18    fraudulent statement and representation to FEMA in an application for  
19    benefits authorized, transported, transmitted, transferred,  
20    disbursed, and paid in connection with the Presidential Disaster  
21    Declaration for the State of California (FEMA-4856-DR), effective on  
22    or about January 8, 2025, and made under Section 401 of the Robert T.  
23    Stafford Disaster Relief and Emergency Assistance Act, which benefits  
24    concerned a record, voucher, payment, money, and thing of value of  
25    the United States or any department or agency thereof. Specifically,  
26    defendant TURNER knowingly and fraudulently applied for FEMA benefits  
27    pertaining to damage to a residence located in Los Angeles County,  
28    which she claimed was a rental property and her primary address, when

1 in fact she had no legitimate connection to that address, did not  
2 reside in California, and did not qualify for benefits.

3 A TRUE BILL

4  
5 /S/  
6 Foreperson

7 BILAL A. ESSAYLI  
8 United States Attorney

9 

10 LINDSEY GREER DOTSON  
11 Assistant United States Attorney  
12 Chief, Criminal Division

13 KRISTEN A. WILLIAMS  
14 Assistant United States Attorney  
15 Chief, Major Frauds Section

16 SCOTT PAETTY  
17 Assistant United States Attorney  
18 Deputy Chief, Major Frauds Section

19 KERRY L. QUINN  
20 Assistant United States Attorney  
21 Major Frauds Section