

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 22-99  
v. \* SECTION: "T"  
LINDA REED HILL \*  
\* \* \*

FACTUAL BASIS

The Defendant, **LINDA REED HILL** (hereinafter, the "Defendant" or "**HILL**"), has agreed to enter a plea of guilty pursuant to a plea agreement. **HILL** has agreed to plead guilty to theft of government funds in violation of Title 18, United States Code, Section 641 as charged in Count One of the Bill of Information.

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant.

The government would establish that Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The Social Security Administration ("SSA") was a government agency responsible for the management of the Social Security program, as defined in the Social Security Act.

According to SSA records, [REDACTED] (**HILL**'s mother) received Title II – Retirement Survivor Insurance ("RSI") benefits after her death in Orleans Parish on April 28, 2004. Bank records reveal that from approximately May 1, 2004, through February 28, 2021, **HILL** collected approximately \$319,696.00 of [REDACTED] RSI that should not have been received

AUSA PK  
Defendant REP  
Defense Counsel DC

after [REDACTED] death. At the beginning of every month, SSA Treasury Funds were deposited into a JP Morgan Chase Savings account, shared jointly by HILL and [REDACTED] (Deceased). From there, SSA funds (ranging from \$1,310.00 - \$1,518.00/month) were used on transactions or transfers out to other accounts. Of the funds transferred out, SSA Treasury Funds were transferred out to two different accounts listed under HILL's name or linked ATM/Debit cards by Account to Account Transfers. These transfers include online transfers, ATM withdrawals, pre-authorized payments, phone funds transfer withdrawals, and online direct payment transfers.

On February 3, 2021, at 2:00 pm, Special Agents ("Agents") with the SSA Office of Inspector General ("OIG") conducted a non-custodial interview of HILL at her residence. Agents informed HILL they wanted to speak with her regarding her mother's date of death and her mother's RSI program monthly benefits. [REDACTED]

[REDACTED]

JP Morgan Chase Bank's account documents indicate 847 transactions totaling \$319,696.00 to HILL's two JP Morgan Chase Bank accounts over the nearly seventeen-year period when SSA funds were erroneously issued to [REDACTED] after her death.

The government and HILL agree that the loss amount attributable to HILL is \$319,696.00.

Various records and testimonial evidence, including testimony from representatives of the SSA-OIG and other witnesses would also be admitted to prove the facts set forth above.

**Limited Nature of Factual Basis and Conclusion**

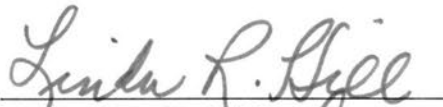
This proffer of evidence is not intended to constitute a complete statement of all facts known by HILL, and/or the government. Rather, it is a minimum statement of facts intended to

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Defendant [Signature]  
Defense Counsel [Signature]


prove the necessary factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **HILL**.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, Special Agents and forensic examiners from the SSA-OIG, and admissible tangible exhibits in the custody of the SSA-OIG.

READ AND APPROVED:

 9.20.22  
\_\_\_\_\_  
LINDA REED HILL  
Defendant

 9.20.22  
\_\_\_\_\_  
DAVID COURCELLE  
Counsel for Defendant

 9/20/22  
\_\_\_\_\_  
BRIAN M. KLEBBA  
Assistant United States Attorney