

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

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WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR THEFT OF GOVERNMENT FUNDS
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

JERRY CAMPBELL

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CRIMINAL NO. 18-171
SECTION: SECT. R MAG. 3
VIOLATION: 18 U.S.C. § 641

* * *

The Grand Jury charges that:

COUNT 1

THEFT OF GOVERNMENT FUNDS

A. AT ALL TIMES MATERIAL HEREIN:

1. 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.

2. Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits.

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3. The SSA operated the nation's federal welfare program known as the Title XVI Supplemental Security Income ("SSI") program.

4. The SSI program was designed to assist infirm, blind, and disabled individuals whose income and resources fell below specified levels.

5. C.C. was a resident of the Eastern District of Louisiana and she received monthly SSI disability benefits that were electronically deposited into her Chase Bank account.

6. C.C. was the sister of the defendant, **JERRY CAMPBELL** ("CAMPBELL").

7. C.C. died on or about November 8, 2013.

8. The SSA continued to make monthly SSI disability deposits into C.C.'s Chase Bank account after her death.

B. THE OFFENSE:

Beginning on or about November 8, 2013, and continuing until on or about January 22, 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **JERRY CAMPBELL**, did knowingly embezzle, steal, purloin, and convert to his use, money belonging to the United States and a department and agency thereof, namely, money of the Social Security Administration, to which he knew he was not entitled, when he used an ATM card to withdraw approximately \$32,836.00 in SSI disability benefits from his deceased sister's Chase Bank account, all in violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 1, defendant, **JERRY CAMPBELL**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 641.

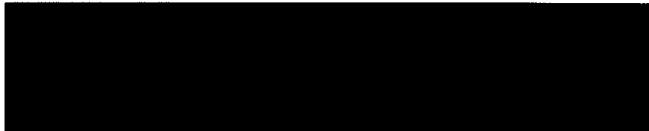
3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "B M K", written over a horizontal line.

BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
August 9, 2018