

FILED AS  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
2019 SEP 26 P 12:55  
WILLIAM W. KEVING

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

INDICTMENT FOR THEFT OF  
GOVERNMENT FUNDS AND NOTICE OF FORFEITURE

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

19-195

v.

\*

SECTION:

SECT M MAG 3

HAYDEE ARMAS SANTANA

\*

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.
3. The SSA operated the Supplemental Security Income ("SSI") program.

Fee USA \_\_\_\_\_  
 Process \_\_\_\_\_  
 Dkt \_\_\_\_\_  
 Cir/Dep \_\_\_\_\_  
 Doc. No. \_\_\_\_\_

4. On or about February 24, 2011, **HAYDEE ARMAS SANTANA** (“**SANTANA**”) purchased a condominium in Miramar Beach, Florida.

5. In or about January 2015, **SANTANA**, filed for and became eligible for SSA SSI benefits.

6. In or about January 2015, **SANTANA** submitted a Form SSA-8001, under penalty of perjury, to the SSA in which she denied owning additional real property other than her home and claimed she only had \$200.00 in a Citizen Bank & Trust checking account.

7. **SANTANA** received monthly SSA benefits totaling of approximately \$31,060.61, which were deposited into **SANTANA**’s bank account.

8. **SANTANA** maintained an individual checking account with Iberia Bank which was not disclosed to the SSA on her Form SSA-8001.

**B. THE OFFENSE:**

Beginning in or about January 2015, and continuing until in or about November 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **HAYDEE ARMAS SANTANA**, did knowingly embezzle, steal, purloin, and convert to her use, money belonging to the United States and a department and agency thereof, namely the SSA, to which she knew she was not entitled, when she concealed her ownership of real property and an Iberia Bank account, while, at the same time, she was paid approximately \$31,060.61 in SSA SSI benefits; 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, **HAYDEE ARMAS SANTANA**, 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



FOREPERSON

PETER G. STRASSER  
UNITED STATES ATTORNEY

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

BRIAN M. KLEBBA  
Assistant United States Attorney

New Orleans, Louisiana  
September 26, 2019