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U.S. DISTRICT COURT
EASTERN DISTRICT OF L.

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CAROL L. MICHELI
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

*

CRIMINAL NO.

21-0076

v.

*

SECTION:

SECT. A MAG. 5

IGEL CASANOVA GIBBINS

*

VIOLATION:

18 U.S.C. § 641

*

* * *

The United States Attorney 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.

Fee WSA
 Process _____
 Dktd _____
_____ CtRmDep _____
_____ Doc. No. _____

3. The SSA operated the Retirement Survivor Insurance Benefit Program (“RSI Program”). The purpose of the RSI Program is to provide benefits to certain persons, including widows and widowers, in their retirement. The RSI Program helps lessen the economic impact of old age, disability, loss of earnings power and reduce a person’s dependency on private and/or public charity.

4. RSI Program funds are self-financing federal funds from the Treasury Trust Funds that receive money generated by dedicated employment taxes (“FICA”) on designated wages and self-employment income.

5. The SSA’s ability to properly determine a beneficiary’s initial and continued eligibility, and the correct monthly benefit, is directly dependent upon SSA’s ongoing access to accurate and current information regarding the beneficiary.

6. In or around March 2012, D.C. applied for and began receiving RSI Program benefits. The SSA sent the benefits to D.C.’s Capital One (“Capital One”) Bank jointly held bank account [REDACTED], via automatic deposit. **IGEL CASANOVA GIBBINS (“GIBBINS”)**, D.C.’s daughter, was a joint account holder of the Capital One account [REDACTED].

7. On or about August 16, 2012, D.C. died.

8. **GIBBINS** never advised the SSA of D.C.’s death. The RSI benefits were not transferrable to **GIBBINS**.

9. From in or around August 2012 through in or around November 2020, the SSA deposited approximately \$202,417.00 into D.C.’s Capital One account.

B. THE OFFENSE:

Beginning in or around August 2012, and continuing until in or around November 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **IGEL CASANOVA GIBBINS**,

did willfully and 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 failed to alert the SSA of the death of her father D.C., and continued to use the RSI Program benefits automatically deposited in the jointly held Capital One account [REDACTED], for her personal benefit in the amount of approximately \$200,396.00; all in violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

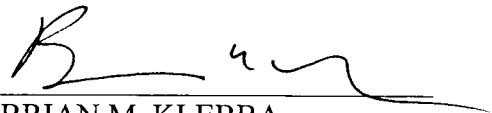
2. As a result of the offense alleged in Count 1, the defendant, **IGEL CASANOVA GIBBINS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offense.

3. If any of the above-described 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

DUANE A. EVANS
UNITED STATES ATTORNEY

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

BRIAN M. KLEBBA
K. PAIGE O'HALE (LA #35943)
Assistant United States Attorneys

New Orleans, Louisiana
June 15, 2021