

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2021 NOV 12 5:43

CAROL L. NICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA

v.

CATHERINE CAMPBELL WILLIAMS

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CRIMINAL NO.

SECTION:

VIOLATION:

21-0145
SECT. T MAG. 5

18 U.S.C. § 641

The Grand Jury charges that:

COUNT 1

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 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

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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 October 1995, B.C. applied for and began receiving RSI Program benefits. The SSA sent the benefits to B.C.'s Hancock Whitney Bank ("Whitney") jointly held bank account [REDACTED] via automatic deposit. **CATHERINE CAMPBELL WILLIAMS** ("**WILLIAMS**"), B.C.'s daughter, was the joint account holder of the Whitney account [REDACTED].

7. On or about December 26, 2010, B.C. died.

8. **WILLIAMS** never advised the SSA of B.C.'s death. The RSI benefits were not transferrable to **WILLIAMS**.

9. From in or around December 2010 through in or around December 2020, the SSA deposited approximately \$61,324.00 into B.C.'s Whitney account.

B. THE OFFENSE:

Beginning in or around December 2010, and continuing until in or around December 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **CATHERINE CAMPBELL WILLIAMS**, 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 B.C., and

continued to use the RSI Program benefits automatically deposited in the jointly held Whitney account [REDACTED], for her personal benefit in the amount of approximately \$61,324.00, in violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

1. The allegation of Count 1 of this Indictment is incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

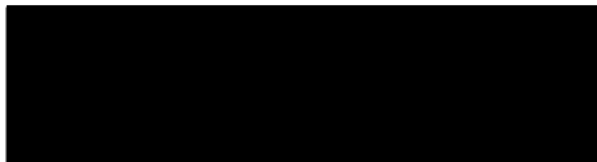
2. As a result of the offense alleged in Count 1, the defendant, **CATHERINE CAMPBELL WILLIAMS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or 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.

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY

A handwritten signature in cursive script, appearing to read "Maria M. Carboni", written over a horizontal line.

MARIA M. CARBONI
Assistant United States Attorney

New Orleans, Louisiana
November 12, 2021