

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

2022 MAR 11 PM 12:49

CAROL L. MICHELI
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FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA

*

CRIMINAL NO. **22 - 44**

v.

*

SECTION: **SECT. J MAG. 2**

RACHEL COONEY

*

VIOLATION: 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 Title II – Disability Insurance Benefit Program (“DIB Program”). The purpose of the DIB Program is to provide for the tragic consequences of old age, disability, loss of earnings power and to reduce dependency on private and/or public charity.

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4. DIB Program funds are self-financing federal funds from the Treasury Trust Funds that receive money generated by dedicated employment taxes 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 January 11, 2007, [REDACTED] applied for DIB Program benefits. In or around June 2007, [REDACTED] began receiving DIB Program benefits. The SSA sent the benefits to [REDACTED] Regions Bank account. **RACHEL COONEY** ("COONEY") was [REDACTED] daughter.

7. On or about November 4, 2015, [REDACTED] died.

8. **COONEY** never advised the SSA of [REDACTED] death. The DIB Program benefits were not transferable.

9. From in or around November 2015 through in or around July 2020, the SSA deposited approximately \$76,139 into [REDACTED] Regions Bank account.

B. THE OFFENSE:

1. Beginning in or around November 2015, and continuing until in or around July 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **RACHEL COONEY**, 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 mother, [REDACTED] and continued to use the DIB Program benefits automatically deposited into [REDACTED] Regions Bank account in the amount of \$76,139, 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, **RACHEL COONEY**, 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:

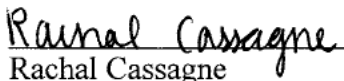
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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:


FOREPERSON

DUANE A. EVANS
UNITED STATES ATTORNEY


Rachal Cassagne
Assistant United States Attorney
La. Bar Roll No. 37082
New Orleans, Louisiana
March 11, 2022