

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR
THEFT OF GOVERNMENT FUNDS**

22-00099

UNITED STATES OF AMERICA

*

CRIMINAL NO.

v.

*

SECTION:

SECT. T MAG. 1

LINDA REED HILL

*

VIOLATION: 18 U.S.C. § 641

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* * *

The United States Attorney 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.

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3. The SSA operated the Retirement Survivor Insurance (“RSI”) program which provided benefits to individuals until their death.

4. Individual “A,” the mother of **LINDA REED HILL** (“**HILL**”), died on or about April 28, 2004.

5. Prior to April 28, 2004, Individual “A” received SSA RSI benefits.

6. After Individual “A’s” death, from approximately May 2004 to February 2021, Individual A continued to receive monthly SSA disability benefits in an amount ranging from \$1,310.00 - \$1,518.00 per month, totaling \$319,696.00, which was deposited by SSA into a joint JP Morgan Chase Savings account, shared by **HILL** and Individual “A.”

7. The monthly SSA funds were then taken from the joint account, transferred to two different accounts listed under **HILL**’s name, and withdrawn by **HILL**.

B. THE OFFENSE:

Beginning in or about May 1, 2004, and continuing until in or about February 28, 2021, in the Eastern District of Louisiana and elsewhere, the defendant, **LINDA REED HILL**, 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 withdrew funds from a joint JP Morgan Chase Bank account under her own name and Individual “A’s” name, 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, defendant, **LINDA REED HILL**, 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, any property, real or personal, involved in said offense, which constitutes or is derived from proceeds traceable to such offense.

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;

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 EVANS
UNITED STATES ATTORNEY



BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
May 6, 2022