

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 21-145  
v. \* SECTION: "T"(5)  
CATHERINE CAMPBELL WILLIAMS \*

\* \* \*

FACTUAL BASIS

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegation in the Indictment now pending against the defendant, charging her with one count of violating Title 18, United States Code, Section 641.

The government would establish that Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. 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.

The government would establish that the case against **CATHERINE CAMPBELL WILLIAMS ("WILLIAMS")** began after the State of Louisiana complied with a request from SSA to provide the SSA with death data of approximately 1.6 million Social Security number holders who had died in Louisiana from January 1, 1979, through December 31, 2019. As part of that data, the State of Louisiana disclosed that [REDACTED], a participant in the SSA's Retirement Survivor Insurance program ("RSI Program"), died on or about December 26, 2010.

Unaware of [REDACTED] death, the SSA erroneously released approximately \$61,324.00 in RSI Program funds from December 2010, through December 2021, via automatic wire transfers (i.e.,

AUSA me  
Defendant ccw  
Defense Counsel SD



\$61,324.00 in RSI Program benefits intended for [REDACTED] Various records and testimonial evidence, including testimony from representatives of the SSA-OIG and other witnesses would also be admitted to prove the facts set forth above.

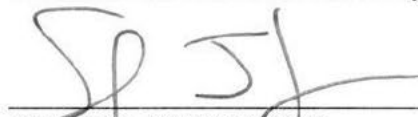
**Limited Nature of Factual Basis and Conclusion**

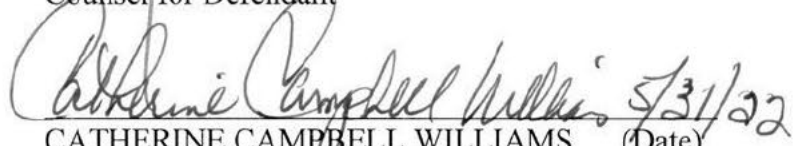
This proffer of evidence is not intended to constitute a complete statement of all facts known by **WILLIAMS**, and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **WILLIAMS**.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, Special Agents and forensic examiners from the Social Security Administration, Office of the Inspector General, and admissible tangible exhibits in the custody of the SSA-OIG.

READ AND APPROVED:

  
\_\_\_\_\_  
MARIA M. CARBONI (Date)  
Assistant United States Attorney

  
\_\_\_\_\_  
SAMUEL SCILLITANI (Date)  
Counsel for Defendant

  
\_\_\_\_\_  
CATHERINE CAMPBELL WILLIAMS (Date)  
Defendant