

OIG agents determined [REDACTED] benefits were electronically deposited into his Regions account. The SSA-OIG confirmed [REDACTED] was the father of the defendant, lived at the same address as the defendant, and died on March 9, 2019.

The SSA-OIG subpoenaed [REDACTED] Regions Bank account and determined from March 2019 to July 2020 **COCKERHAM** knowingly accessed and converted approximately \$37,651.00 in funds intended for her deceased father.

In addition, the government would introduce evidence that on or about April 29, 2020, a \$1,200.00 CARES ACT payment was direct deposited by the IRS in [REDACTED] Regions Bank account.

On March 30, 2021, **COCKERHAM** was interviewed by special agents with the SSA-OIG and the Treasury Inspection General for Tax Administration (“TIGTA”). [REDACTED]

[REDACTED]

The SSA determined that, after her father’s death, **COCKERHAM** fraudulently obtained \$37,651.00 in SSA disability benefits from her father’s Regions Bank account. TIGTA agents determined **COCKERHAM** fraudulently obtained \$1,200.00 in CARES ACT funds.

Limited Nature of Factual Basis and Conclusion

This proffer of evidence is not intended to constitute a complete statement of all facts known by **COCKERHAM**, 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

AUSA BR
Defendant MJ
Defense Counsel SSJ

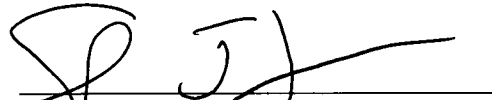
proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **COCKERHAM**.

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 SSA-OIG, TIGTA, and admissible tangible exhibits in the custody of the SSA-OIG and TIGTA.

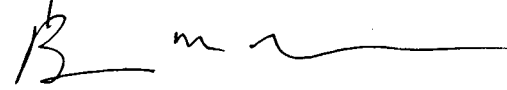
READ AND APPROVED:



NICOLE COCKERHAM
Defendant



SAMUEL J. SCELITANI, JR.
Counsel for Defendant



BRIAN M. KLEBBA
Assistant United States Attorney