

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 22-56

v. * SECTION: "D"

JOHN EDWARD JONES *

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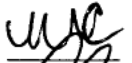
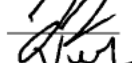

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FACTUAL BASIS

Should this matter have proceeded to trial, the government would have proven the following facts, beyond a reasonable doubt, to support the allegation in the Indictment now pending against the defendant, charging him with one count of violating Title 18, United States Code, Section 641. The government would have proven these facts through the introduction of competent testimony by Special Agents with the Social Security Administration ("SSA"), Office of the Inspector General ("OIG") and admissible exhibits in the custody of the SSA-OIG, including bank records, employment records, and documents obtained from Southwest Airlines, Lyft, and Amazon.

The government would establish that Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The 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 [REDACTED] a participant in the SSA's Supplemental Security Income - Disability Program ("SSID Program"), died on or about December 6, 2014. Unaware of [REDACTED] death, the SSA erroneously released approximately \$46,230.00 in SSID Program funds from January 2015 through March 2020, via automatic wire transfers (i.e., direct

AUSA 
Defendant 
Defense Counsel 

deposit) to [REDACTED] Green Dot Bank account [REDACTED].

The SSA-OIG conducted an investigation and learned that **JOHN EDWARD JONES** (“**JONES**”) had accessed [REDACTED] Green Dot Bank account [REDACTED] after [REDACTED] death and wrongfully converted \$40,361.00 in [REDACTED] SSID Program funds to his own personal use starting in or around July 2015. **JONES** was the roommate of [REDACTED] son. [REDACTED] SSID Program benefits were not transferrable to **JONES**.


Specifically, SSA-OIG reviewed records for [REDACTED] Green Dot Bank account [REDACTED]. According to this review, at the beginning of each month, SSID Program benefits were deposited into the account. The funds were used to buy goods and services at Southwest Airlines, Lyft, and Amazon, among others. Subpoenas to Southwest Airlines, Lyft, and Amazon revealed that the transactions were tied to **JONES**. Moreover, from 2016 to 2019, **JONES** also had recurring deposits from his employers deposited into this same account as the SSID Program benefits. On or about March 2, 2022, SSA-OIG Special Agent [REDACTED] [REDACTED] and Louisiana State Police (“LSP”) Trooper [REDACTED] interviewed **JONES** [REDACTED]
[REDACTED]
[REDACTED]

Limited Nature of Factual Basis and Conclusion

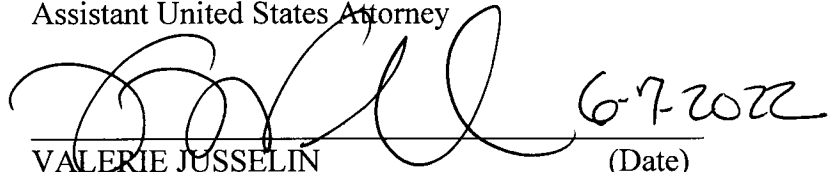
This proffer of evidence is not intended to constitute a complete statement of all facts known by **JONES**, and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to

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

READ AND APPROVED:



MARIA M. CARBONI (Date)
Assistant United States Attorney



VALERIE JUSSÉLIN (Date)
Counsel for Defendant



JOHN EDWARD JONES (Date)
Defendant