

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 15-___
v.	:	
WAYNE TIFFANY	:	VIOLATION:
	:	18 U.S.C. § 641 (conversion of government
	:	funds - 1 count)
		Notice of Forfeiture

INFORMATION

COUNT ONE

(Conversion of Government Funds)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (“SSI”) program, pursuant to Title 42, United States Code, Sections 1381-1383f.
2. The SSI program, which was funded through general tax revenues of the United States, provided monthly case benefits to individuals who were age sixty-five or over, or who were “disabled” and who demonstrated financial need, as determined by his or her “income” and “resources,” as those terms were defined for purposes of the Social Security Act.
3. SSI payments continued unless the disabled individual’s disability improved, or until the disabled individual returned to work or died.
4. The paramour of defendant WAYNE TIFFANY, identified in this

information as "G.N.," received SSI benefits during her lifetime. The SSA issued G.N.'s SSI benefits via wire deposit into her bank account.

5. G.N. died on or about April 20, 2010. Upon G.N.'s death, no other individual was entitled to receive G.N.'s benefit payments.

6. After G.N.'s death, SSA continued to make her benefit payments via wire deposit into her bank account, which was held only in G.N.'s name. Subsequent to G.N.'s death, defendant WAYNE TIFFANY accessed the SSA benefit payments intended for his deceased paramour that were deposited into G.N.'s account via use of the debit/ATM card tied to the account.

7. SSA terminated G.N.'s SSI benefits payments on or about February 4, 2015.

8. Between on or about May 1, 2010 and continuing through on or about February 3, 2015, defendant WAYNE TIFFANY improperly received and converted to his own use approximately \$39,028 in SSA benefit payments that were intended for G.N., who was deceased, which defendant TIFFANY knew he was not entitled to receive.

9. Beginning on or about May 1, 2010 through on or about February 3, 2015, in the Eastern District of Pennsylvania and elsewhere, the defendant

WAYNE TIFFANY

knowingly converted to his own use money of the United States in excess of \$1,000, that is, approximately \$39,028 in SSA benefits that were intended for G.N., who was deceased, to which the defendant knew he was not entitled.

In violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 641, set forth in this information, defendant

WAYNE TIFFANY

shall forfeit to the United States of America:

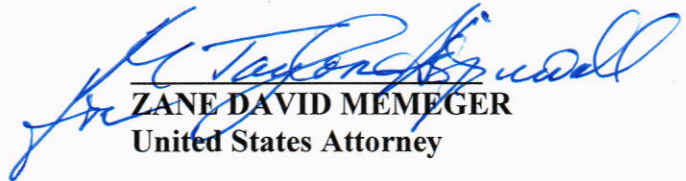
(a) any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$39,028.

2. 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 party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).


ZANE DAVID MEMEGER
United States Attorney