

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

	:	
	:	<b>CRIMINAL NO. 13-_____</b>
	:	<b>DATE FILED:</b>
<b>UNITED STATES OF AMERICA</b>	:	<b>VIOLATIONS:</b>
v.	:	<b>18 U.S.C. § 641 (conversion of government funds – 1 count)</b>
<b>CRYSTAL D. ANDERSON</b>	:	<b>42 U.S.C. § 408(a)(4) (social security fraud – 1 count)</b>
<b>a/k/a “Crystal D. Lee”</b>	:	<b>42 U.S.C. § 1383a(a)(3) (social security fraud – 1 count)</b>
	:	<b>42 U.S.C. § 408(a)(7)(A) (social security fraud – 1 count)</b>

**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 (Title XVI of the Social Security Act) and the Disability Insurance Benefit (“DIB”) program, pursuant to Title 42, United States Code, Sections 401-434 (Title II of the Social Security Act).

2. The SSI program was funded through general tax revenues of the United States and provided monthly cash benefits to individuals who were “disabled” within the meaning of the Social Security Act and who, in addition, are eligible for the program on the

basis of financial need, as determined in relation to both “income” and “resources,” as those terms are defined for purposes of the Social Security Act.

3. The DIB program was an earned-right program funded through Social Security wage taxes. When an individual worked, that individual paid taxes on his or her wages into the Social Security trust fund. If that individual became “disabled” and paid sufficient Social Security taxes to become “insured,” as those terms were defined for purposes of the Social Security Act, he or she was eligible to receive disability insurance benefits, which were designed to replace part of the individual’s earnings lost due to disability.

4. The ability of SSA to properly make initial determinations as to both an applicant’s medical and financial eligibility for SSI and DIB was directly dependent upon SSA’s access to accurate and current information regarding that applicant. Moreover, if an applicant initially was found to be eligible, and therefore became an SSI or DIB “recipient,” SSA’s ability to properly determine that recipient’s continuing eligibility, and the correct monthly benefit due that recipient, likewise was directly dependent upon SSA’s ongoing access to accurate and current information regarding that recipient.

5. SSA required disabled SSI and DIB recipients to advise SSA of any changes in their condition, income, employment status, resources, address, living arrangements, family size and composition, and family income and resources.

6. SSI and DIB payments were terminated if the disabled individual’s disability improved, the disabled individual returned to work, or died.

7. In or about March 1982, defendant CRYSTAL D. ANDERSON applied for and received Social Security number (SSN) xxx-xx-7964.

8. In or about October 1990, defendant CRYSTAL D. ANDERSON applied for SSI and DIB using SSN xxx-xx-7964.

9. On or about December 21, 1990, defendant CRYSTAL D. ANDERSON's application was denied and she filed for reconsideration, which was also denied on or about June 4, 1991. Defendant ANDERSON subsequently requested an administrative hearing before an administrative law judge.

10. On or about June 12, 1991, defendant CRYSTAL D. ANDERSON, applied for another SSN under the name "Crystal D. Lee." On the application, defendant ANDERSON indicated that she had never previously been issued a SSN, and as a result, "Crystal D. Lee" was issued SSN xxx-xx-8394.

11. In or about October 1991, defendant CRYSTAL D. ANDERSON began working for and earning income from Resources for Human Development, Inc. (RHD), under the name "Crystal Lee," using SSN xxx-xx-8394. From in or about October 1991 through in or about December 2011, defendant ANDERSON worked for various employers including, but not limited to, RHD, Horizon House, Inc., Special Care Nurses, Inc., the Devereaux Foundation, Northwestern Human Services and United Health Systems of Fairmount, using the name "Crystal Lee" and SSN xxx-xx-8394.

12. After receiving an adverse ruling at her SSA administrative hearing, in or about April 1992 defendant CRYSTAL D. ANDERSON appealed the decision denying her DIB and SSI benefits to the SSA Appeals Council.

13. On or about April 8, 1993, the Appeals Council, which was unaware that defendant CRYSTAL D. ANDERSON was working and earning income under the name

“Crystal Lee” with SSN xxx-xx-8394, awarded defendant ANDERSON SSI and DIB benefits with an effective date of November 1990.

14. From in or about April 1993 through in or about November 2011, defendant CRYSTAL D. ANDERSON collected monthly SSI and DIB payments from SSA. Each month, SSA either directly deposited a SSI and DIB check into Anderson’s bank account, or mailed a SSI or DIB check to Anderson’s address.

15. Defendant CRYSTAL D. ANDERSON did not notify SSA that she was employed and receiving income under SSN xxx-xx-8394 as “Crystal Lee,” while she was simultaneously receiving SSI and DIB under SSN xxx-xx-7964 as “Crystal Anderson.” Therefore, SSA continued to mail and directly deposit “Crystal Lee’s” monthly SSI and DIB checks.

16. The undisclosed employment and income received by defendant CRYSTAL D. ANDERSON made her ineligible to receive SSA DIB and SSI payments beginning in January 1996.

17. Defendant CRYSTAL D. ANDERSON improperly received approximately \$105,108.32 in SSI and DIB payments because she was employed and receiving income under another identity and was therefore ineligible for such benefits.

18. From in or about January 1996 through in or about November 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**CRYSTAL D. ANDERSON**

knowingly embezzled, stole, purloined or converted to her own use money of the United States in excess of \$1,000, that is, approximately \$105,108.32 in SSI and DIB payments, which she was ineligible to receive.

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

**COUNT TWO**

**(Social Security Fraud - Concealment of an Event Affecting Right to Payment)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 17 of Count One of this indictment are incorporated here.

2. Beginning in or about April 1993 and continuing through on or about April 26, 2011, in the Eastern District of Pennsylvania, defendant

**CRYSTAL D. ANDERSON,**

having knowledge of the occurrence of an event affecting her continued right to receive Social Security DIB payments, knowingly concealed and failed to disclose such event to SSA with the intent to fraudulently secure such benefits in an amount greater than was due and when no such benefits were authorized. Specifically, in order to continue to receive the DIB payments for herself, defendant ANDERSON concealed from and failed to disclose to SSA that she was working and earning income under a different name and SSN.

In violation of Title 42, United States Code, Section 408(a)(4).

**COUNT THREE**

**(Social Security Fraud - Concealment of an Event Affecting Right to Payment)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 17 of Count One of this indictment are incorporated here.

2. Beginning in or about April 1993 and continuing through on or about April 26, 2011, in the Eastern District of Pennsylvania, defendant

**CRYSTAL D. ANDERSON,**

having knowledge of the occurrence of an event affecting her continued right to receive Social Security SSI payments, knowingly concealed and failed to disclose such event to SSA with the intent to fraudulently secure such benefits in an amount greater than was due and when no such benefits were authorized. Specifically, in order to continue to receive the SSI payments for herself, defendant ANDERSON concealed from and failed to disclose to SSA that she was working and earning income under a different name and SSN.

In violation of Title 42, United States Code, Section 1383a(a)(4).

**COUNT FOUR**

**(Social Security Fraud - Misuse of a Social Security Number)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 17 of Count One of this indictment are incorporated here by reference.

2. On or about April 23, 2009, defendant CRYSTAL D. ANDERSON applied for a Pennsylvania Identification Card in the name "Crystal D. Lee" from the Pennsylvania Department of Transportation (PENNDOT) and, in support of her application, provided a Social Security account number xxx-xx-8394 that was issued to her by the Commissioner of Social Security based on false information that defendant ANDERSON had furnished to the Commissioner of Social Security.

3. As a result of her fraudulent activity, defendant CRYSTAL D. ANDERSON received a photographic identification card from PENNDOT under the name, "Crystal D. Lee," a false and fictitious identity.

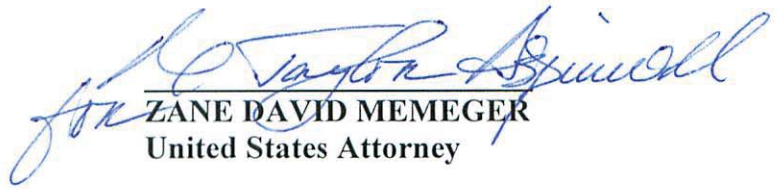
4. On or about April 23, 2009, in the Eastern District of Pennsylvania, defendant

**CRYSTAL D. ANDERSON,**

with intent to deceive, and for the purpose of obtaining a Pennsylvania Identification Card with a false and fictitious name from the Pennsylvania Department of Transportation, willfully and knowingly used social security account number xxx-xx-8394, a social security account number she received from the Commissioner of Social Security based upon false information she had furnished to the Commissioner of Social Security, in support of her application for a Pennsylvania Identification Card.



In violation of Title 42, United States Code, Section 408(a)(7)(A).

  
**ZANE DAVID MEMEGER**  
United States Attorney