

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 15-_____
v.	:	DATE FILED: _____
PHYLLIS RANSOME, a/k/a "Phyllis Roberts"	:	VIOLATIONS:
	:	18 U.S.C. § 1343 (wire fraud - 9 counts)
	:	18 U.S.C. § 641 (conversion of government funds - 1 count)
	:	42 U.S.C. § 1383a(a)(3) (Social Security fraud - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH NINE

(Wire Fraud)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this indictment:

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 cash 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. The SSA also administered the Retirement and Survivors Insurance (“RSI”) benefits program, pursuant to Title 42, United States Code, Sections 401-433. RSI benefits included widow’s benefits.

4. The RSI 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 a working individual died after paying sufficient Social Security taxes to become “insured,” as that term was defined for purposes of the Social Security Act, that individual’s surviving spouse, or divorced spouse was eligible to receive widow’s benefits (“WB”).

5. Defendant PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” possessed and used two Social Security numbers. Social Security number xxx-xx-0634 was obtained in or about March 1963, and last associated with the name of “Phyllis Ransome.” Social Security number xxx-xx-9866 was obtained in or about August 1966, and last associated with the name “Phyllis Roberts.”

THE SCHEME TO DEFRAUD

6. From in or about October 2009 through in or about December 2014, defendant

**PHYLLIS RANSOME,
a/k/a “Phyllis Roberts,”**

devised and intended to devise a scheme to defraud the SSA and to obtain money from the SSA in the form of SSI benefits greater than the amount she was entitled to because she was receiving widow’s benefits under a second Social Security number without disclosing to the Social Security Administration receipt of benefits under two separate Social Security numbers.

7. It was the object of the scheme described in paragraph 6 for defendant PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” to receive approximately \$42,108 in SSI payments that she was not entitled to receive.

MANNER AND MEANS

It was part of the scheme that:

8. On or about May 25, 2006, defendant PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” applied for widow’s benefits on the basis of her deceased ex-husband’s earnings record. She applied using the name “Phyllis Ransome” and the Social Security number xxx-xx-0634. She was approved for these benefits in or about June 2006.

9. On or about September 10, 2009, defendant PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” applied for disability benefits from the Social Security Administration using the name “Phyllis Roberts” and the Social Security number xxx-xx-9866. She was approved for Supplemental Security Income (“SSI”) benefit payments on or about August 10, 2010, with an eligibility date of October 2009. Accordingly, she received “back payments” in or about September 2010 to provide the amount of money she was entitled to beginning in October 2009. During her application for and subsequent receipt of SSI benefits, defendant RANSOME did not disclose to SSA her possession of a second Social Security number, or her receipt of widow’s benefits.

10. Defendant PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” received her Supplemental Security Income benefits via electronic wire deposit from the United States Treasury Department, on behalf of the Social Security Administration, between on or about October 1, 2010 through on or about December 1, 2014.

11. Had the Social Security Administration known that PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” had two Social Security numbers, and was receiving widow’s benefits, she would not have been entitled to the full amount of Supplemental Security Income benefits that she received between in or about October 2009 through in or about December 2014. Specifically, she received \$42,108 more in Supplemental Security Income benefits than what she was entitled to.

12. From on or about October 1, 2010 through on or about December 1, 2014 in the Eastern District of Pennsylvania, and elsewhere, defendant

**PHYLLIS RANSOME,
a/k/a “Phyllis Roberts,”**

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds representing SSI benefit payments from the SSA to the defendant PHYLLIS RANSOME, a/k/a “Phyllis Roberts,” as described below, each transfer constituting a separate count:

<u>COUNT</u>	<u>DATE OF WIRE TRANSFER</u>	<u>DESCRIPTION OF WIRE TRANSFER</u>
1	December 30, 2010	SSA payment of \$674.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
2	June 1, 2011	SSA payment of \$674.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.

3	December 1, 2011	SSA payment of \$674.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
4	June 1, 2012	SSA payment of \$674.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
5	November 30, 2012	SSA payment of \$698.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
6	May 31, 2013	SSA payment of \$710.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to the Eastern District of Pennsylvania.
7	November 29, 2013	SSA payment of \$710.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to the Eastern District of Pennsylvania.
8	May 30, 2014	SSA payment of \$721.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to the Eastern District of Pennsylvania.
9	December 1, 2014	SSA payment of \$721.00 by wire transfer from Baltimore, Maryland to Kansas City, Missouri, to East Rutherford, New Jersey, to the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Section 1343.

COUNT TEN

(Conversion of Government Funds)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Counts One through Nine of this indictment are realleged here.

2. Beginning in or about September 2010 through on or about December 1, 2014, in the Eastern District of Pennsylvania and elsewhere, defendant

**PHYLLIS RANSOME,
a/k/a "Phyllis Roberts,"**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$42,108 in SSI benefits payments, which she was ineligible to receive.

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

COUNT ELEVEN

(Social Security Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 of Counts One through Nine of this indictment are realleged here.

2. Beginning on or about September 10, 2009 and continuing through on or about December 1, 2014, in the Eastern District of Pennsylvania and elsewhere, defendant

**PHYLLIS RANSOME,
a/k/a "Phyllis Roberts,"**

in a matter within the jurisdiction of the Social Security Administration ("SSA"), having knowledge of the occurrence of an event affecting her initial and continuing right to receive payment of Supplemental Security Income benefit payments, specifically, her receipt of widow's benefits using a second Social Security number, concealed and failed to disclose such event with the intent to fraudulently secure payment in a greater amount than was due.

In violation of Title 42, United States Code, Section 1383a(a)(3).

NOTICE OF FORFEITURE

THE GRAND JURY CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 641 and 1343, set forth in this indictment, defendant

**PHYLLIS RANSOME,
a/k/a “Phyllis Roberts,”**

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 \$42,108.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

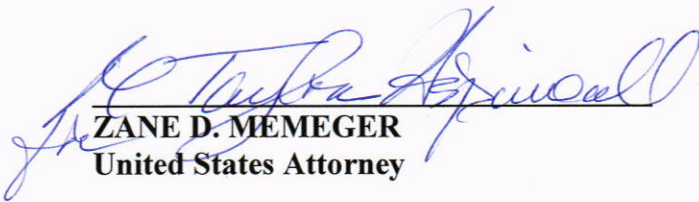
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot 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 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).

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE D. MEMEGER
United States Attorney