

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 16-___</b>
<b>v.</b>	:	<b>DATE FILED:</b>
<b>DARYL MCCALL</b>	:	<b>VIOLATION:</b>
	:	<b>18 U.S.C. § 641 (conversion of government funds - 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 Retirement Survivor’s Insurance (“RSI”) program, pursuant to Title 42, United States Code, Sections 401-433.
2. 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 that individual paid sufficient Social Security taxes to earn sufficient “credits,” as that term was defined for purposes of the Social Security Act, he or she, or eligible dependents, including spouses, were eligible to receive retirement benefits upon reaching a certain age.
3. RSI payments continued until the individual died.
4. The mother of defendant DARYL MCCALL, identified in this

information as "R.M.," received RSI benefits during her lifetime. The SSA issued R.M.'s RSI benefits via wire deposit into her bank account.

5. R.M. died on or about March 14, 2009. Upon R.M.'s death, no other individual was entitled to receive R.M.'s benefit payments.

6. After R.M.'s death, SSA continued to make her benefit payments via wire deposit into her bank account. Subsequent to R.M.'s death, defendant DARYL MCCALL withdrew R.M.'s benefits from R.M.'s bank account and used the money for his own expenses.

7. In or about August 2013, subsequent to learning of R.M.'s death, SSA terminated her benefits.

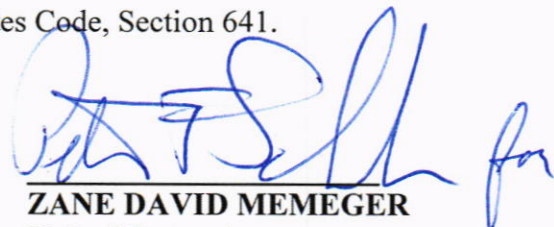
8. Between in or about March 2009 and in or about August 2013, defendant DARYL MCCALL improperly received and converted to his own use approximately \$52,314 in SSA benefit payments that were intended for R.M., who was deceased, which defendant MCCALL knew he was not entitled to receive.

9. Beginning in or about March 2009 and continuing through in or about August 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

**DARYL MCCALL**

knowingly converted to his own use money of the United States in excess of \$1,000, that is, approximately \$52,314 in SSA benefits that were intended for R.M., who was deceased, to which the defendant knew he was not entitled.

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

  
**ZANE DAVID MEMEGER**  
United States Attorney