

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 16-___
v.	:	DATE FILED:
DOROTHEA TERFINKO	:	VIOLATION:
	:	18 U.S.C. § 641 (conversion of government funds – 1 count)

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 Disability Insurance Benefits (“DIB”) program, pursuant to Title 42, United States Code, Sections 401-433.
2. 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.
3. DIB payments continued unless the disabled individual’s “disability” improved, or until the disabled individual returned to work or died.

4. Individuals who applied for DIB were required to disclose all sources of income, including income from cohabitating spouses, and to report any changes in income or cohabitation.

5. In or about 2003, defendant DOROTHEA TERFINKO made application to SSA for DIB payments. In her DIB application, defendant TERFINKO stated that she and her husband B.T. were separated and that B.T. was no longer living in her home. Defendant TERFINKO also agreed to notify the SSA if someone moved into or out of her household.

6. After defendant DOROTHEA TERFINKO completed her application, defendant TERFINKO's husband B.T. returned to her household and resided with defendant TERFINKO from 2003 to 2006. At various times from 2006 to 2013, B.T. also resided with defendant DOROTHEA TERFINKO.

7. At various times, including April 4, 2006 and October 19, 2010, defendant DOROTHEA TERFINKO provided information to SSA in support of her continued DIB benefits. Although required to do so, at no time did defendant TERFINKO notify SSA that B.T. resided in her household.

8. Between in or about December 2003 and in or about December 2013, defendant DOROTHEA TERFINKO improperly received and converted to her own use approximately \$48,485.13 in SSA benefit payments which defendant TERFINKO knew she was not entitled to receive.

9. Beginning in or about December 2003 and continuing through in or about December 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

DOROTHEA TERFINKO

knowingly converted to her own use money of the United States in excess of \$1,000, that is,

approximately \$48,435.13 in SSA benefits to which the defendant knew she 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

DOROTHEA TERFINKO

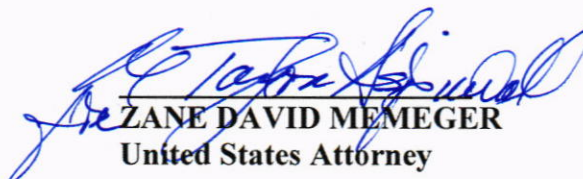
shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$48,435.13.

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