UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK UNITED STATES OF AMERICA

v.

INFORMATION

23 Cr. (

ELIZABETH TORRES,

Defendant.

<u>COUNT ONE</u> (False Statement or Fraud to Obtain Federal Employees' Compensation)

The United States Attorney charges:

From at least in or about December 2009, up to and including at least in or about February 2020, in the Southern District of New York and elsewhere, ELIZABETH TORRES, the defendant, knowingly and willfully falsified, concealed, and covered up material facts, and made false, fictitious, and fraudulent statements and representations, and made and used false statements and reports knowing the same to contain false, fictitious, and fraudulent statements and entries in connection with an application for and receipt of compensation and other benefits under Title 5, United States Code, Sections 8102 *et seq.*, which benefits exceed the sum of \$1,000, to wit, TORRES falsely represented, among other things, that: (a) she was significantly disabled for more than ten years, during which periods she applied for and received hundreds of thousands of dollars in federal worker's compensation benefits, when in fact she was not so disabled; (b) a dependent was living with her for various years, when in fact a dependent was not; (c) she was not receiving pay for various years, when in fact she was; and (d) she was not working or performing volunteer

work, when in fact she was, including that, among other positions, TORRES had fulltime paid employment at a drug rehabilitation clinic in New York City from at least 2015 through 2019.

(Title 18, United States Code, Sections 1920 and 2.)

DAMIAN WILLIAMS

United States Attorney for the Southern District of New York