

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KIMBERLY JOANN WAUZYNYSKI,

f/k/a Kimberly Joann Denne,

Defendant.

) **INDICTMENT**
)
) 18 U.S.C. § 641
) 42 U.S.C. § 1383a(a)(3)
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CR 13-206 SRN/LIB

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Theft of Public Money)

From in or about September 2008 through in or about May 2012, in the State and District of Minnesota, the defendant,

KIMBERLY JOANN WAUZYNYSKI,
f/k/a Kimberly Joann Denne,

did knowingly embezzle, steal, purloin, and convert to her use and the use of another, money of the Social Security Administration (“SSA”), a department or agency of the United States, namely, Supplemental Security Income (“SSI”) benefits to which she knew she was not entitled, having a value of approximately \$27,851.08, in violation of Title 18, United States Code, Section 641.

COUNT 2
(Social Security Benefits Fraud)

From in or about September 2008 through in or about May 2012, in the State and District of Minnesota, the defendant,



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KIMBERLY JOANN WAUZYNski,
f/k/a Kimberly Joann Denne,

with the intent to fraudulently secure Supplemental Security Income (“SSI”) benefits that were not authorized and were in a greater amount than were due, did knowingly conceal from and did fail to disclose to the Social Security Administration (“SSA”) the occurrence of an event affecting her initial and continued right to receive payment of SSI benefits on behalf of minor J.T.W. Specifically, the defendant intentionally concealed the fact that minor J.T.W.’s father was living with her and minor J.T.W. and supporting the household in order to continue to receive and spend payments of SSI benefits made to minor J.T.W. All in violation of Title 42, United States Code, Section 1383a(a)(3).

FORFEITURE ALLEGATIONS

Count One of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of Count One of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28 United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 641.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title

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21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 981(a)(1)(C) and 1341, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON