

**FILED**  
At Albuquerque NM

OCT 14 2010

**MATTHEW J. DYKMAN**  
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
**ANGELA R. CHAVEZ,** )  
)  
Defendant. )

CRIMINAL NO. 10-2841

Counts 1-4: 42 U.S.C. § 408(a)(5):  
Social Security Fraud;

Counts 5-8: 18 U.S.C. § 641: Theft of  
Government Property.

INDICTMENT

The Grand Jury charges:

Count 1

Beginning on or about January 1, 2001, and continuing on about or during March 2009, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ANGELA R. CHAVEZ**, having made application to receive payment from the Social Security Administration, a department and agency of the United States, for the use and benefit of another and having received such payments, knowingly and willfully converted such payments, and any part thereof, to a use other than for the use and benefit of such other person. Specifically, the defendant, **ANGELA R. CHAVEZ**, received payments from Social Security as the payee representative for the child survivor benefits of John Doe #1 (SSN # 6491) and used these payments for purposes other than for the use and benefit of John Doe #1 (SSN # 6491).

In violation of 42 U.S.C. § 408(a)(5).

Count 2

Beginning on or about December 1, 2008, and continuing through on or about March 2010, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ANGELA R. CHAVEZ**, having made application to receive payment from the Social Security Administration, a department and agency of the United States, for the use and benefit of another and having received such payments, knowingly and willfully converted such payments, and any part thereof, to a use other than for the use and benefit of such other person. Specifically, the defendant, **ANGELA R. CHAVEZ**, received payments from Social Security as the payee representative for the child survivor benefits of John Doe #2 (SSN # 4852) and used these payments for purposes other than for the use and benefit of John Doe #2 (SSN # 4852).

In violation of 42 U.S.C. § 408(a)(5).

Count 3

Beginning on or about December 1, 2008, and continuing through on or about March 2010, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ANGELA R. CHAVEZ**, having made application to receive payment from the Social Security Administration, a department and agency of the United States, for the use and benefit of another and having received such payments, knowingly and willfully converted such payments, and any part thereof, to a use other than for the use and benefit of such other person. Specifically, the defendant, **ANGELA R. CHAVEZ**, received payments from Social Security as the payee representative for the child

survivor benefits of Jane Doe #1 (SSN # 4770) and used these payments for purposes other than for the use and benefit of Jane Doe #1 (SSN # 4770).

In violation of 42 U.S.C. § 408(a)(5).

Count 4

Beginning on or about December 1, 2008, and continuing through on or about March 2010, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ANGELA R. CHAVEZ**, having made application to receive payment from the Social Security Administration, a department and agency of the United States, for the use and benefit of another and having received such payments, knowingly and willfully converted such payments, and any part thereof, to a use other than for the use and benefit of such other person. Specifically, the defendant, **ANGELA R. CHAVEZ**, received payments from Social Security as the payee representative for the child survivor benefits of Jane Doe #2 (SSN # 8444) and used these payments for purposes other than for the use and benefit of Jane Doe #2 (SSN # 8444).

In violation of 42 U.S.C. § 408(a)(5).

Count 5

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, the Defendant, **ANGELA R. CHAVEZ**, willfully and knowingly did steal, embezzle, and purloin money of the Social Security Administration (SSA), a department or agency of the United States, namely, Social Security benefit payments made to her as the payee representative of the survivor child John Doe #1 (SSN # 6491) in an amount the aggregate total of which exceeds \$1,000, to which she knew she was not

entitled, resulting in payments of the following approximate amounts, in the total approximate amount of \$7,216:

Count	Month	SSA Benefits	Amount of payment
1	October 2005	SSA	\$159
2	November 2005	SSA	\$159
3	December 2005	SSA	\$166
4	January 2006	SSA	\$166
5	February 2006	SSA	\$166
6	March 2006	SSA	\$166
7	April 2006	SSA	\$166
8	May 2006	SSA	\$166
9	June 2006	SSA	\$166
10	July 2006	SSA	\$166
11	August 2006	SSA	\$166
12	September 2006	SSA	\$166
13	October 2006	SSA	\$166
14	November 2006	SSA	\$166
15	December 2006	SSA	\$171
16	January 2007	SSA	\$171
17	February 2007	SSA	\$171
18	March 2007	SSA	\$171
20	April 2007	SSA	\$171
21	May 2007	SSA	\$171
22	June 2007	SSA	\$171
23	July 2007	SSA	\$171
24	August 2007	SSA	\$171

Count	Month	SSA Benefits	Amount of payment
25	September 2007	SSA	\$171
26	October 2007	SSA	\$171
27	November 2007	SSA	\$171
28	December 2007	SSA	\$175
29	January 2008	SSA	\$175
30	February 2008	SSA	\$175
31	March 2008	SSA	\$175
32	April 2008	SSA	\$175
33	May 2008	SSA	\$175
34	June 2008	SSA	\$175
35	July 2008	SSA	\$175
36	August 2008	SSA	\$175
37	September 2008	SSA	\$175
38	October 2008	SSA	\$175
39	November 2008	SSA	\$175
40	December 2008	SSA	\$185
41	January 2009	SSA	\$185
42	February 2009	SSA	\$185
42	March 2009	SSA	\$185
		Total	\$7,216

In violation of 18 U.S.C. § 641.

Count 6

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, the Defendant, **ANGELA R. CHAVEZ**, willfully and knowingly did steal,

embezzle, and purloin money of the Social Security Administration (SSA), a department or agency of the United States, namely, Social Security benefit payments made to her as the payee representative of the survivor child John Doe #2 (SSN # 4852) in an amount the aggregate total of which exceeds \$1,000, to which she knew she was not entitled, resulting in payments of the following approximate amounts, in the total approximate amount of \$5,680:

Count	Month	SSA Benefits	Amount of payment
1	December 2008	SSA	\$355
2	January 2009	SSA	\$355
3	February 2009	SSA	\$355
4	March 2009	SSA	\$355
5	April 2009	SSA	\$355
6	May 2009	SSA	\$355
7	June 2009	SSA	\$355
8	July 2009	SSA	\$355
9	August 2009	SSA	\$355
10	September 2009	SSA	\$355
11	October 2009	SSA	\$355
12	November 2009	SSA	\$355
13	December 2009	SSA	\$355
14	January 2010	SSA	\$355
15	February 2010	SSA	\$355
16	March 2010	SSA	\$355
		Total	\$5,680

In violation of 18 U.S.C. § 641.

Count 7

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, the Defendant, **ANGELA R. CHAVEZ**, willfully and knowingly did steal, embezzle, and purloin money of the Social Security Administration (SSA), a department or agency of the United States, namely, Social Security benefit payments made to her as the payee representative of the survivor child Jane Doe #1 (SSN # 4770) in an amount the aggregate total of which exceeds \$1,000, to which she knew she was not entitled, resulting in payments of the following approximate amounts, in the total approximate amount of \$5,680:

Count	Month	SSA Benefits	Amount of payment
1	December 2008	SSA	\$355
2	January 2009	SSA	\$355
3	February 2009	SSA	\$355
4	March 2009	SSA	\$355
5	April 2009	SSA	\$355
6	May 2009	SSA	\$355
7	June 2009	SSA	\$355
8	July 2009	SSA	\$355
9	August 2009	SSA	\$355
10	September 2009	SSA	\$355
11	October 2009	SSA	\$355
12	November 2009	SSA	\$355
13	December 2009	SSA	\$355
14	January 2010	SSA	\$355
15	February 2010	SSA	\$355

Count	Month	SSA Benefits	Amount of payment
16	March 2010	SSA	\$355
		Total	\$5,680

In violation of 18 U.S.C. § 641.

Count 8

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, the Defendant, **ANGELA R. CHAVEZ**, willfully and knowingly did steal, embezzle, and purloin money of the Social Security Administration (SSA), a department or agency of the United States, namely, Social Security benefit payments made to her as the payee representative of the survivor child Jane Doe #2 (SSN # 8444) in an amount the aggregate total of which exceeds \$1,000, to which she knew she was not entitled, resulting in payments of the following approximate amounts, in the total approximate amount of \$5,680:

Count	Month	SSA Benefits	Amount of payment
1	December 2008	SSA	\$355
2	January 2009	SSA	\$355
3	February 2009	SSA	\$355
4	March 2009	SSA	\$355
5	April 2009	SSA	\$355
6	May 2009	SSA	\$355
7	June 2009	SSA	\$355
8	July 2009	SSA	\$355
9	August 2009	SSA	\$355
10	September 2009	SSA	\$355



Count	Month	SSA Benefits	Amount of payment
11	October 2009	SSA	\$355
12	November 2009	SSA	\$355
13	December 2009	SSA	\$355
14	January 2010	SSA	\$355
15	February 2010	SSA	\$355
16	March 2010	SSA	\$355
		Total	\$5,680

In violation of 18 U.S.C. § 641.

A TRUE BILL:



Assistant United States Attorney

/s/  
FOREPERSON OF THE GRAND JURY

JT 10/08/10 8:38am