

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO: 11-176
v.	*	SECTION: "K"
ALMA WILLIAMS	*	
	* * *	

FACTUAL BASIS

Should this matter have gone to trial, the government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, the following to support the allegations charged by the government in the one-count Bill of Information now pending against the defendant, ALMA WILLIAMS.

ALMA WILLIAMS ("WILLIAMS") was a recipient of Social Security Disability Insurance Benefits ("DIB") since 1993. WILLIAMS was required to report any changes that would affect her right to the disability benefits, such as becoming employed. In 2009, the Social Security Administration ("SSA") received wage information from A-1 Absolute Best Care, LLC, for ALMA WILLIAMS but under a different social security number. According to the SSA records, WILLIAMS' name and the social security number submitted by A-1 Absolute Best Care, LLC, did not match. On February 4, 2010, an SSA representative requested that WILLIAMS report to the SSA

office located in Terrytown, Louisiana, to clear up the issue of her earnings. On March 3, 2010, WILLIAMS reported to the SSA office and denied that she had worked at A-1 Absolute Best Care, LLC. WILLIAMS signed a Statement of Claimant or Other Person, form SSA-795, where she stated, "I have never worked for A1 Absolute Best Care LLC. I have no (sic) worked from 2003 to the present."

WILLIAMS' personnel record from A-1 Absolute Best Care, LLC shows that WILLIAMS began working there on September 10, 2003. The employment application submitted by WILLIAMS, dated August 20, 2003, shows that WILLIAMS used Social Security number xxx-xx-8388, which belongs to another person. WILLIAMS' real Social Security number is xxx-xx-8288. SSA also received copies of WILLIAMS' W-2s for the years 2003 through 2009 and daily time sheets from A-1 Absolute Best Care, LLC.

Bank records from ASI Federal Credit Union shows that SSA directly deposited WILLIAMS' SSA disability benefits into her account each month. Furthermore, records from Capitol One Bank show that WILLIAMS' net earnings from A-1 Absolute Best Care, LLC were directly deposited into WILLIAMS' checking account at Capitol One Bank. WILLIAMS received a bi-weekly salary from A-1 Absolute Best Care, LLC since September 15, 2003. The monthly amount that WILLIAMS earns from A-1 Absolute Best Care, LLC is greater than the threshold amount allowable for an individual who is receiving SSA disability benefits.

On June 30, 2010, SSA agents interviewed WILLIAMS. Prior to the interview, the SSA agents advised WILLIAMS of her *Miranda* warnings via an Advice of Rights form to which WILLIAMS signed. WILLIAMS also signed an affidavit admitting that she worked for A-1 Absolute Best Care, LLC since 2003 and that she knowingly altered her social security number to conceal her identity in order to continue receiving her Social Security Title II disability benefits.

By engaging in the behavior outlined above, WILLIAMS did knowingly embezzle, steal, purloin, and convert to her own use Social Security Administration Disability Insurance Benefits to which she knew she was not entitled. The Social Security Administration is a department and agency of the United States.

The Government would prove that the amount of restitution for the purposes of this offense is approximately \$69,651.

ALMA WILLIAMS
Defendant

Date

ROMA KENT (01459)
Assistant Federal Public Defender
Attorney for Defendant

Date

LOAN "MIMI" NGUYEN (23612)
Assistant United States Attorney

Date