

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 10 - 384
	:	
v.	:	DATE FILED: June 15, 2010
	:	
BARBARA MORRIS	:	VIOLATION:
	:	18 U.S.C. § 641 (conversion of government
	:	funds – 1 count)
	:	18 U.S.C. § 982 (criminal forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Retirement Insurance Benefit (“RIB”) program, pursuant to Title 42, United States Code, Sections 401 - 433.
2. The RIB 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 paid sufficient Social Security taxes to earn sufficient “credits,” as that term was defined for purposes of the Social Security Act, he or she was eligible to receive retirement insurance benefits upon reaching a certain age.
3. RIB payments continued until the individual dies.

4. A family member of defendant BARBARA MORRIS, identified in this Indictment as “R.S.,” received RIB benefits during his lifetime. The SSA deposited R.S.’s RIB payments directly into his bank account.

5. R.S. died on January 4, 1993.

6. SSA was not timely notified of R.S.’s death and continued to deposit R.S.’s monthly benefits checks into his bank account, which he shared with defendant BARBARA MORRIS. From January 1993 through June 2006, defendant BARBARA MORRIS fraudulently converted R.S.’s benefits checks.

7. In or about June 2006, over thirteen years after R.S.’s death, SSA learned that R.S. had died, and terminated his RIB payments.

8. Defendant BARBARA MORRIS improperly received and converted to her own use approximately \$96,765.00 in RIB payments that were intended for R.S, who was deceased.

9. Beginning in or about January 1993 and continuing through in or about June 2006, in the Eastern District of Pennsylvania, defendant

BARBARA MORRIS

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$96,765.00 in RIB payments that were intended for R.S., who was deceased.

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

BARBARA MORRIS

shall forfeit to the United States of America:

- (a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission such offense; and
- (b) any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense.

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).

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE D. MEMEGER
United States Attorney