

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 10 -600
	:	
v.	:	DATE FILED: September 10, 2010
	:	
KIA DAWN DAVENPORT	:	VIOLATION:
a/k/a “Elizabeth Davenport”	:	18 U.S.C. § 641 (conversion of government
	:	funds – 1 count)
	:	18 U.S.C. § 981 (forfeiture)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (“SSI”) program, pursuant to Title 42, United States Code, Sections 1381-1383f.

2. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, or who were “disabled” and who demonstrated financial need, as determined by his or her “income” and “resources,” as those terms were defined for purposes of the Social Security Act.

3. From January 1980 through February 2010, defendant KIA DAVENPORT, a/k/a “ELIZABETH DAVENPORT,” received SSI benefits under the name “ELIZABETH DAVENPORT,” with Social Security Number (SSN) xxx-xx-0895. The SSA deposited the benefits checks directly into PNC checking account ending in 4000. Her address of record for purposes of this benefit was 6013 N. 11th Street, Philadelphia, PA.

4. From approximately 1980 through 1983 and from approximately 1990 through December 2009, defendant KIA DAVENPORT, a/k/a “ELIZABETH DAVENPORT,” was employed under the name KIA DAVENPORT and SSN xxx-xx-0438.

5. In or about December 2009, defendant KIA DAVENPORT, a/k/a “ELIZABETH DAVENPORT,” applied for SSA retirement benefits under the name KIA DAVENPORT, with SSN xxx-xx-0438. In her application for retirement benefits, KIA DAVENPORT provided an address of 6013 N. 11th Street, Philadelphia, PA.

6. In or about December 2009, SSA learned that defendant KIA DAVENPORT, a/k/a “ELIZABETH DAVENPORT,” received SSI benefits from 1980 through December 2009 even though she was employed from 1980 through 1983 and from 1990 through 2009. Thus, SSA terminated her SSI payments.

7. Defendant KIA DAVENPORT, a/k/a “ELIZABETH DAVENPORT,” improperly received approximately \$127,760.12 in SSI payments despite that she was employed and was therefore ineligible for such benefits.

8. Beginning in or about January 1980 through in or about December 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

KIA DAWN DAVENPORT
a/k/a “Elizabeth Davenport”

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$127,760.12 in SSI benefits payments, which she was ineligible to receive.

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

**KIA DAWN DAVENPORT
a/k/a “Elizabeth Davenport”**

shall forfeit to the United States of America:

(a) 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).

ZANE DAVID MEMEGER
United States Attorney