

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 10 - _____
	:	
v.	:	DATE FILED:
	:	
ANTONYA STALLWORTH	:	VIOLATION:
	:	18 U.S.C. § 641 (Conversion of
	:	Government Funds – 1 count)
	:	Notice of 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 Disability Insurance Benefit (“DIB”) program, pursuant to Title 42, United States Code, Sections 401-433.
2. The DIB 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 became “disabled” and paid sufficient Social Security taxes to become “insured,” as those terms were defined for purposes of the Social Security Act, he or she was eligible to receive disability insurance benefits, which were designed to replace part of the individual’s earnings lost due to disability.
3. DIB payments continued unless the disabled individual’s disability improved, or until the disabled individual returned to work or died.

4. The mother of defendant ANTONYA STALLWORTH, identified in this information as “P.A.,” received DIB benefits during her lifetime. The SSA directly deposited P.A.’s benefits checks into her account at Citadel Federal Credit Union.

5. P.A. died on May 4, 2002.

6. SSA was not timely notified of P.A.’s death and continued to deposit her benefits checks into her account, which she shared with defendant ANTONYA STALLWORTH. From May 2002 through November 2008, defendant ANTONYA STALLWORTH fraudulently obtained and converted P.A.’s benefits checks.

7. During each month after the death of P.A. until November 2008, defendant ANTONYA STALLWORTH continued to access the account and convert the benefits checks deposited into P.A.’s account.

8. In November 2008, over six years after P.A.’s death, SSA learned that P.A. had died, and terminated her DIB payments.

9. Defendant ANTONYA STALLWORTH improperly received a total of approximately \$84,698 in DIB payments that were intended for P.A., who was deceased, which defendant ANTONYA STALLWORTH knew she was not entitled to receive.

10. Beginning in or about May 2002 and continuing through in or about November 2008, in the Eastern District of Pennsylvania and elsewhere, defendant

ANTONYA STALLWORTH

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$84,698 in DIB payments that were intended for P.A., 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

ANTONYA STALLWORTH

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©, 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©, and Title 18, United States Code, Section 981(a)(1)©.

/s/ Michael L. Levy
MICHAEL L. LEVY
UNITED STATES ATTORNEY