

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 11-\_\_\_\_**  
**v.** : **DATE FILED: July , 2011**  
**DORIS WILLIAMS** : **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 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 died.
4. The father of defendant DORIS WILLIAMS, identified in this information as “G.D.,” received RIB benefits during his lifetime. The SSA directly deposited G.D.’s benefits checks into an account at Citizens Bank that was jointly held by defendant DORIS WILLIAMS and G.D.

5. G.D. died on January 3, 2002.

6. SSA was not timely notified of G.D.'s death and continued to deposit his benefits checks into the account. From February 2002 through September 2010, defendant DORIS WILLIAMS fraudulently obtained and converted G.D.'s RIB funds.

7. During each month after the death of G.D. until September 2010, defendant DORIS WILLIAMS continued to access the account and convert the RIB funds deposited into G.D.'s account, and never notified SSA that G.D. had died.

8. In or about September 2010, almost nine years after G.D.'s death, SSA learned that G.D. had died, and terminated his RIB payments.

9. Defendant DORIS WILLIAMS improperly received and converted to her own use approximately \$62,382 in RIB payments that were intended for G.D., who was deceased, which defendant DORIS WILLIAMS knew she was not entitled to receive.

10. Beginning in or about February 2002 and continuing through in or about September 2010, in the Eastern District of Pennsylvania and elsewhere, defendant

**DORIS WILLIAMS**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$62,382 in RIB payments that were intended for G.D., 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

**DORIS WILLIAMS**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, including, but not limited to the sum of approximately \$62,382.00.

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).

*Peter F Schenk for*  

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**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**