

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 11-637</b>
	:	
<b>v.</b>	:	<b>DATE FILED: October 20, 2011</b>
	:	
<b>LINDA MARTIN</b>	:	<b>VIOLATION:</b>
<b>a/k/a “Linda McCarty”</b>	:	<b>18 U.S.C. § 641 (conversion of government</b>
	:	<b>funds – 1 count)</b>
	:	<b>18 U.S.C. § 981 (forfeiture)</b>

**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 in or about May 1993 through in or about May 2011, defendant LINDA MARTIN, a/k/a “Linda McCarty,” received SSI benefits under the name “Linda Selma Martin,” with Social Security Number (SSN) xxx-xx-2415. Benefits were paid retroactively back to 1987. The SSA deposited the benefits checks directly into Citizens Bank account ending

8183 in the name of “Linda McCarty.” During the period she received this benefit, defendant MARTIN resided in Leola, PA.

4. From approximately 1970 through 1981, 1983 through 1993, and 1995 through 2011, defendant LINDA MARTIN was employed and received earnings under a separate Social Security Number, xxx-xx-5364.

5. In or about June 2007, LINDA MARTIN applied for retirement benefits on SSN xxx-xx-5364. She began receiving retirement benefits in or about July 2007 and continues to receive them at the present time. Her address of record for this benefit is her residence in Leola, PA.

6. In or about April 2011, SSA learned that defendant LINDA MARTIN, a/k/a “Linda McCarty” received SSI benefits from May 1993 through May 2011 even though she was employed from approximately 1970 through 1981, 1983 through 1993, and 1995 through the present time. Thus, SSA terminated her SSI payments.

7. In total, defendant LINDA MARTIN, a/k/a “Linda McCarty,” unlawfully received approximately \$109,817.04 in SSI payments despite that she was employed and was therefore ineligible to receive such benefits.

8. Beginning in or about May 1993 through in or about May 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**LINDA MARTIN**  
**a/k/a “Linda McCarty”**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$109,817.04 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

**LINDA MARTIN  
a/k/a “Linda McCarty”**

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**