

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 12-____
	:	
v.	:	DATE FILED:
	:	
EVELYN BAPTISTE,	:	VIOLATIONS:
a/k/a "Evelyn Jenkins"	:	18 U.S.C. § 641 (Theft of government funds
	:	- 1 count)
	:	42 U.S.C. § 1383a(a)(3)(A) (Social Security
	:	fraud - 1 count)

INFORMATION

COUNT ONE

(Theft of Government Funds)

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. In or about January 1946, defendant EVELYN BAPTISTE was issued a Social Security Number ("SSN"), xxx-xx-2408, under her birth name, "Evelyn Jeannette

Shields.” She subsequently requested the names associated with this SSN include “Evelyn Washington” and “Evelyn Jeannette Jenkins.” Defendant EVELYN BAPTISTE worked under this SSN between 1951 and 1963.

4. In or about February 1976, defendant EVELYN BAPTISTE applied for and was issued a second SSN, xxx-xx-2555, in the name of “Evelyn Jenkins.” In or about June 1982, she requested that the name associated with this SSN be changed to EVELYN BAPTISTE due to marriage. SSA records show that she worked under this SSN between 1975 and 2006.

5. On or about December 22, 1976, defendant EVELYN BAPTISTE applied for SSI under the SSN xxx-xx-2408, and never disclosed that she had been using two separate SSNs. She was subsequently approved for SSI with a payment effective date of January 1977. She received these SSI benefits until in or about June 2011.

6. In or about January 1978, defendant EVELYN BAPTISTE returned to work under her other SSN, xxx-xx-2555, despite the fact that she had claimed to be disabled and was receiving SSI under SSN xxx-xx-2408.

7. On or about December 15, 1991, defendant EVELYN BAPTISTE applied for and subsequently received retirement benefits from the SSA under SSN xxx-xx-2555.

8. Defendant EVELYN BAPTISTE did not report any work activity under the SSN xxx-xx-2408 subsequent to her application for SSI in or about 1976, and continued to fraudulently receive SSI benefits while she worked and subsequently, while she collected retirement benefits under SSN xxx-xx-2555 beginning in or around February 1992.

9. Beginning in or about January 1978 and continuing through in or about June 2011, in the Eastern District of Pennsylvania and elsewhere, the defendant

EVELYN BAPTISTE
a/k/a “Evelyn Jenkins”

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$186,681.06 in SSI benefits to which she knew she was not entitled.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

(Social Security Fraud)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

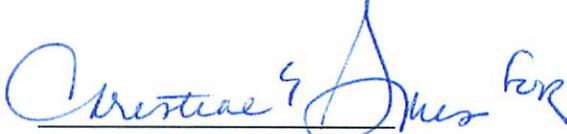
1. Paragraphs 1-8 of Count One of this information are realleged here.
2. From in or about January 1978 and continuing through in or about June

2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**EVELYN BAPTISTE,
a/k/a "Evelyn Jenkins,"**

in a matter within the jurisdiction of the Social Security Administration ("SSA"), willfully, knowingly, and with the intent to deceive, concealed and failed to disclose an event affecting her continued right to SSI benefit payments, in that she concealed and failed to disclose all of her income to the SSA, and that she was working and receiving income under another Social Security number, as she was required to do in order to receive those SSI benefit payments.

In violation of Title 42, United States Code, Section 1383a(a)(3)(A).


ZANE DAVID MEMEGER
United States Attorney