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CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2019 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWENA ISABEL LOKENI,

Defendant.

SA CR No. 19CR00153-JFW

I N D I C T M E N T

[18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 1028A(a)(1):
Aggravated Identity Theft; 18
U.S.C. §§ 981(a)(1)(C), 982, 1028,
28 U.S.C. § 2461(c): Criminal
Forfeiture]

The Grand Jury charges:

COUNTS ONE THROUGH SEVEN

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. The United States Social Security Administration's ("SSA") Retirement Insurance Benefits ("RIB") program was a government-run benefits program intended to replace part of the earnings lost because of a worker's retirement. Under the RIB program, the SSA distributed benefits to eligible persons 62 years of age or older and their eligible dependents who had paid sufficient Federal Insurance

1 Contributions Act taxes into the program. When the insured worker
2 died, cash benefits would be paid to eligible survivors. To receive
3 survivor benefits, one must have filed an application with the SSA
4 and have been either a widow, an unmarried minor child, or a
5 dependent parent aged 62 or older.

6 2. The SSA's Disability Insurance Benefits ("DIB") program was
7 a government-run benefits program intended to replace part of the
8 earnings lost because of a worker's physical or mental impairment.
9 Under the DIB program, the SSA distributed benefits to eligible
10 disabled persons and their eligible beneficiaries throughout their
11 period of disability.

12 3. The SSA's Disabled Adult Child ("DAC") program was a
13 government-run benefits program that provided benefits to unmarried
14 adults who had a disability that started before age 22 and whose
15 parent was either deceased or was receiving RIB or DIB benefits.
16 Such DAC benefits were paid based on the parent's earning record.

17 4. Defendant ROWENA ISABEL LOKENI was an employee, namely, a
18 service representative, of the SSA, a department and agency of the
19 United States. Specifically, defendant LOKENI worked as a service
20 representative at the SSA field office in Fountain Valley,
21 California.

22 5. In her capacity as a service representative, defendant
23 LOKENI's responsibilities included screening for benefit eligibility,
24 processing benefit applications, and responding to benefit inquiries.
25 As an SSA employee, defendant LOKENI had computer access to
26 electronic records of SSA beneficiaries, which were stored on the
27 SSA's servers in Baltimore, Maryland.

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1 6. Defendant LOKENI and her husband were joint account holders
2 for Southland Credit Union account number xxxxxxxx48539 (the
3 "Southland Account").

4 7. Defendant LOKENI resided in or around Garden Grove,
5 California, in the Central District of California.

6 B. THE SCHEME TO DEFRAUD

7 8. Beginning no later than in or about April 2017, and
8 continuing until at least in or about August 2019, in Orange County,
9 within the Central District of California, and elsewhere, defendant
10 LOKENI, knowingly and with the intent to defraud, devised,
11 participated in, and executed a scheme to defraud the SSA and the
12 United States as to material matters, and to obtain money and
13 property from the SSA and the United States by means of materially
14 false and fraudulent pretenses, representations, and promises, and
15 the concealment of material facts.

16 9. The scheme to defraud operated, in substance, as follows:

17 a. Defendant LOKENI queried the records of at least seven
18 SSA beneficiaries, each of whom was receiving either RIB, DIB, or DAC
19 benefits, and fraudulently changed the direct deposit bank account
20 number and routing number associated with each beneficiary's account
21 to instead reflect the account number and routing number of the
22 Southland Account.

23 b. As a result of defendant LOKENI's changes to the
24 beneficiaries' direct deposit information, the SSA deposited monthly
25 benefits payments intended for the affected beneficiaries into the
26 Southland Account.

27 c. Defendant LOKENI withdrew the SSA benefits deposited
28 into the Southland Account through cash withdrawals and debit card

1 transactions to purchase goods and services at various locations
 2 within the Central District of California.

3 10. Through her scheme, defendant LOKENI fraudulently obtained
 4 a total of at least \$146,725.23 of SSA benefits payments to which she
 5 knew she was not entitled.

6 C. USE OF INTERSTATE WIRES

7 11. On or about the following dates, within the Central
 8 District of California, and elsewhere, defendant LOKENI, for the
 9 purpose of executing the above-described scheme to defraud, caused
 10 the transmission of the following items by means of wire
 11 communications in interstate commerce:

COUNT	DATE	ITEM
ONE	April 18, 2017	Direct deposit bank account information for S.C. directing funds to defendant LOKENI's Southland Account, electronically transferred from the SSA office in Fountain Valley, California, to SSA servers in Baltimore, Maryland
TWO	April 20, 2017	Payment of DIB benefits intended for S.C. in the amount of \$13,942, electronically transferred from the United States Treasury in Kansas City, Missouri, to defendant LOKENI's Southland Account in Los Alamitos, California
THREE	July 13, 2017	Direct deposit bank account information for B.R. directing funds to defendant LOKENI's Southland Account, electronically transferred from the SSA office in Fountain Valley, California, to SSA servers in Baltimore, Maryland

COUNT	DATE	ITEM
FOUR	July 18, 2017	Payment of RIB benefits intended for B.R. in the amount of \$9,720, electronically transferred from the United States Treasury in Kansas City, Missouri, to defendant LOKENI's Southland Account in Los Alamitos, California
FIVE	April 19, 2018	Payment of RIB benefits intended for B.R. in the amount of \$7,776, electronically transferred from the United States Treasury in Kansas City, Missouri, to defendant LOKENI's Southland Account in Los Alamitos, California
SIX	December 1, 2018	Direct deposit bank account information for H.J. directing funds to defendant LOKENI's Southland Account, electronically transferred from the SSA office in Fountain Valley, California, to SSA servers in Baltimore, Maryland
SEVEN	December 7, 2018	Payment of DAC benefits intended for H.J. in the amount of \$2,628, electronically transferred from the United States Treasury in Kansas City, Missouri, to defendant LOKENI's Southland Account in Los Alamitos, California

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COUNT EIGHT

[18 U.S.C. § 1028A(a)(1)]

On or about July 13, 2017, in Orange County, within the Central District of California, and elsewhere, defendant ROWENA ISABEL LOKENI knowingly possessed and used, without lawful authority, means of identification that defendant LOKENI knew belonged to another person, namely, the name and Social Security account number of B.R., during and in relation to the offense of Wire Fraud, a felony violation of Title 18, United States Code, Section 1343, as charged in Count Three of this Indictment.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in any of Counts One through Seven of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) all right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, 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 that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. §§ 982 and 1028 and 28 U.S.C. §2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Sections 982 and 1028 and Title 28, United States Code, Section 2461(c) in the event of the defendant's conviction of the offense set forth in Count Eight of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense;

(b) Any personal property used or intended to be used to commit the offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b) and 1028(g), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, 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

1 been commingled with other property that cannot be divided without
2 difficulty.

3 A TRUE BILL

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6 Foreperson

7 NICOLA T. HANNA
8 United States Attorney

9 BRANDON D. FOX
10 Assistant United States Attorney
11 Chief, Criminal Division



12 SCOTT M. GARRINGER
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14 Deputy Chief, Criminal Division

15 CHRISTINA T. SHAY
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17 Deputy Chief, General Crimes
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