UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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| UNITED STATES OF AMERICA | * | CRIMINAL NO.   21-30 |
| v. | * | SECTION:  "I" |
| BETTY ARRINGTON | * | |
| a/k/a  "Betty Callie Arrington" | | |
| a/k/a  "Betty Francis C Miller" | * | |
| a/k/a  "Betty Miller" | | |
| | * | |

\*   \*   \*

**FACTUAL BASIS**

Should this matter have gone to trial, the government would have proven, through the introduction of reliable testimony and admissible tangible exhibits, including documentary evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant, **BETTY ARRINGTON** a/k/a "Betty Callie Arrington," a/k/a "Betty Francis C Miller," a/k/a "Betty Miller" (**"ARRINGTON"**), charging her with violation of Title 18, United States Code, Section 641, namely, theft of government funds.

At trial, the government would establish that Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The Social Security Administration ("SSA") was a government agency responsible for the management of the Social Security program, as defined in the Social Security Act. Witnesses would explain that one of the programs operated by the SSA was the Supplemental Security Income Disability Program ("SSID"), which provided benefits to the aged, blind, or disabled whose income and resources are below specified levels.

AUSA _____

Defendant _____

Defense Counsel _____

The case against **ARRINGTON** began as a result of a complaint received in the SSA Office located in Kenner, Louisiana. SSA Claims Representative ███████ ██ ██████ notified the Office of the Inspector General ("OIG") that **ARRINGTON** was alleged to have intentionally used a Social Security Number ("SSN") not assigned to her in order to conceal her employment and earnings, while, at the same time, being paid SSID benefits.

According to SSA and employment records, beginning in or about 1984 and continuing through 2019, **ARRINGTON** intentionally used a SSN not assigned to her by the Commissioner of the SSA and to which she knew she was not entitled, in order to conceal her employment and earnings.   According to records, since 1986 **ARRINGTON** was continuously employed as a domestic employee with one employer. Beginning in or about June 1997, **ARRINGTON** filed for and later became eligible for SSA SSID benefits. **ARRINGTON** did not disclose her employment in her application for SSA SSID benefits. Moreover, in or about May 2003, August 2006, October 2010, and November 2013, **ARRINGTON** certified to the SSA, under penalty of perjury, that she was not working and had no other income when in fact she was actively and continuously employed. **ARRINGTON** failed to notify the SSA of her employment and other disqualifying factors and intentionally submitted false statements to maintain her eligibility in the SSID program.

On August 28, 2019, CR ████ interviewed **ARRINGTON** at the SSA's office in Kenner. During this interview, **ARRINGTON** admitted to working continuously since 1986 for one employer. **ARRINGTON** further admitted to using a SSN that did not belong to her. **ARRINGTON** admitted to not knowing the person whose SSN she had been using and confirmed having no affiliation with that person. **ARRINGTON** further admitted to receiving SSID since 1998 and to informing SSA during four periodic reviews that she was not employed.

The Government and defendant agree that, between 1998 through 2019, **ARRINGTON**

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AUSA _BJL_
Defendant _AM_
Defense Counsel _VWS_

fraudulently received monthly SSID benefits totaling approximately $164,270.90 by concealing her employment from the SSA.

## Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **ARRINGTON** and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **ARRINGTON**.

READ AND APPROVED:

_____    2-23-2022
BETTY ARRINGTON
Defendant

_____    2-23-2022
VALERIE JUSSELIN
Counsel for Defendant

_____    2/23/22
BRANDON LONG
Assistant United States Attorney

AUSA BSL
Defendant BM
Defense Counsel VWJ