

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 13-____**
v. : **DATE FILED:**
SOPHIA BELTZ : **VIOLATION:**
: **18 U.S.C. § 641 (conversion of government**
: **funds – 1 count)**
: **Notice of Forfeiture**

INFORMATION

COUNT ONE

(Conversion 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 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 SOPHIA BELTZ, identified in this information as “A.G.,” received RIB benefits during his lifetime. The SSA, via the United States Treasury

Department, electronically deposited A.G.'s RIB payments into a bank account with 3rd Federal Bank.

5. A.G. died on or about February 23, 1997.

6. SSA was not timely notified of A.G.'s death and continued to issue RIB payments into his bank account.

7. After A.G.'s death, defendant SOPHIA BELTZ accessed her deceased father's bank account, and improperly received and converted to her own use the RIB benefit payments intended for her deceased father.

8. In or about August 2012, subsequent to learning of A.G.'s death, SSA terminated his RIB payments.

9. Defendant SOPHIA BELTZ improperly received and converted to her own use approximately \$172,133 in RIB payments that were intended for A.G., who was deceased, which defendant SOPHIA BELTZ knew she was not entitled to receive.

10. Beginning in or about February 1997 and continuing through in or about August 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

SOPHIA BELTZ

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$172,133 in RIB payments that were intended for A.G., 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 in the amount of \$172,133, defendant

SOPHIA BELTZ

shall forfeit to the United States of America:

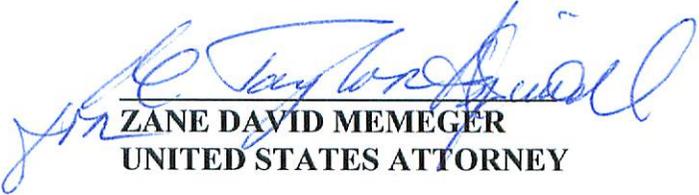
(a) any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense; including but not limited to the sum of \$172,133.

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