

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 13-**
v. : **DATE FILED: _____**
EMERSON FLOWERS : **VIOLATIONS:**
: **18 U.S.C. § 1542 (passport fraud - 1**
: **count)**
: **42 U.S.C. § 408(a)(7)(A) (social security**
: **fraud – 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about September 8, 1989, defendant EMERSON FLOWERS applied the to Commissioner of Social Security for a Social Security Number using a fraudulent United States Virgin Islands birth certificate as evidence of United States citizenship.

2. On or about September 11, 1989, Social Security account number xxx-xx-6452 was issued to defendant EMERSON FLOWERS by the Commissioner of Social Security based on false information that defendant FLOWERS had furnished to the Commissioner of Social Security.

3. On or about November 29, 1989, defendant EMERSON FLOWERS applied for a United States Passport using Social Security account number xxx-xx-6452 and a fraudulent Virgin Islands Birth Certificate as proof of United States citizenship.

4. On or about January 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

EMERSON FLOWERS

knowingly and willfully made false statements in an application for a United States passport, with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant FLOWERS included a fraudulent Virgin Islands birth certificate in support of an application for a United States passport, and stated that he had never previously applied for a United States passport, which statements and representations he knew to be false.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO

THE GRAND JURY CHARGES THAT:

1. Paragraphs 1 through 3 of Count One of this indictment are incorporated here.
2. On or about January 18, 2013, in the Eastern District of Pennsylvania, defendant

EMERSON FLOWERS,

with intent to deceive, and for the purpose of obtaining a United States Passport, willfully and knowingly used social security account number xxx-xx-6452, a social security account number he received from the Commissioner of Social Security based upon false information he had furnished to the Commissioner of Social Security, in support of his application for a United States Passport.

In violation of Title 42, United States Code, Section 408(a)(7)(A).

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**