

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-__
	:	
v.	:	DATE FILED:
	:	
ANGEL GARCIA,	:	VIOLATION:
a/k/a “Angel Ramos”	:	18 U.S.C. § 641 (conversion of government
	:	funds – 1 count)
	:	Notice of Forfeiture

INFORMATION

COUNT ONE

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. Subsequent to his application for SSI benefits, defendant ANGEL GARCIA, a/k/a “Angel Ramos,” was approved by the SSA for SSI benefit payments. From in or about June 1999 through in or about November 2012, defendant ANGEL GARCIA, a/k/a “Angel

Ramos,” received SSI benefits under Social Security Number (SSN) xxx-xx-8296, via electronic deposit into a bank account.

4. While receiving these SSI benefits, defendant ANGEL GARCIA, a/k/a “Angel Ramos,” was employed with several employers under a separate Social Security Number, xxx-xx-9471. He did not report this work activity to the SSA.

5. In or about November 2012, the SSA learned that defendant ANGEL GARCIA, a/k/a “Angel Ramos,” had two Social Security Numbers, and that he was working under xxx-xx-9471 while collecting SSI under xxx-xx-8296. Thus, the SSA terminated his SSI payments.

6. In total, defendant ANGEL GARCIA, a/k/a “Angel Ramos,” unlawfully received approximately \$106,566.60 in SSI payments despite his work activity, which rendered him ineligible to receive such benefits.

7. Beginning in or about June 1999 through in or about November 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

**ANGEL GARCIA,
a/k/a “Angel Ramos,”**

knowingly converted to his own use money of the United States in excess of \$1,000, that is, approximately \$106,566.60 in SSI benefits payments, which he was ineligible to receive.

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 \$106,566.60, defendant

**ANGEL GARCIA,
a/k/a “Angel Ramos”**

shall forfeit to the United States of America:

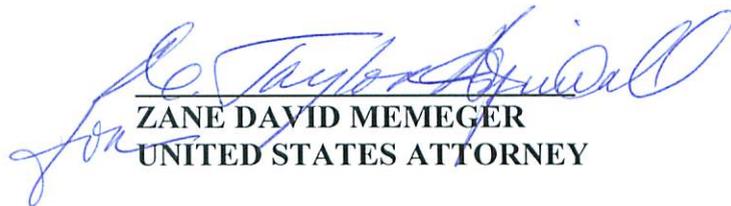
(a) any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$106,566.60.

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