

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CRIMINAL NO. 14-___</b>
<b>v.</b>	:	
<b>GERALDINE JONES</b>	:	<b>DATE FILED:</b>
	:	
	:	<b>VIOLATION:</b>
		<b>18 U.S.C. § 641 (conversion of government funds – 1 count)</b>
		<b>Notice of Forfeiture</b>

**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 and Survivor’s Insurance (“RSI”) benefit program, pursuant to Title 42, United States Code, Sections 401-433.

2. The RSI 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,

or eligible dependents, including spouses, were eligible to receive retirement benefits upon reaching a certain age.

3. RSI payments continued until the individual died.

4. An individual known to defendant GERALDINE JONES, identified in this information as "L.F.," received RSI benefits during her lifetime. The SSA electronically deposited L.F.'s benefits into her bank account.

5. The Department of Veterans Affairs ("VA"), an agency of the United States, by and through the Veterans Benefits Administration, administered certain service-related benefit programs, including a pension plan for service members, their widow/ers, and/or child(ren), pursuant to Title 38, United States Code, Sections 1501-42.

6. These pension benefits continued until the qualified individual died.

7. L.F. was married to an individual identified herein as "W.F." W. F. was a U.S. military veteran, and L.F. received widows death pension benefits subsequent to W.F.'s death. No other individual was entitled to the benefits designated for L.F. The VA electronically deposited L.F.'s benefits into her bank account.

8. L.F. died on or about May 2, 1999.

9. Neither SSA nor the VA has record that they were timely notified of L.F.'s death and continued to issue RSI and VA benefits into her bank account.

10. Defendant GERALDINE JONES accessed L.F.'s bank account after her death, and improperly received and converted to her own use the RSI and VA benefit payments intended for L.F.

11. In or about February and March 2014, subsequent to learning of L.F.'s death, SSA and the VA terminated her benefit payments.

12. Defendant GERALDINE JONES improperly received and converted to her own use approximately \$103,356 in RSI benefit payments from the SSA, and \$52,442 in widows death pension benefit payments from the VA that were intended for L.F., who was deceased, which defendant GERALDINE JONES knew she was not entitled to receive.

13. Beginning on or about May 2, 1999 and continuing through in or about March 2014, in the Eastern District of Pennsylvania and elsewhere, the defendant

**GERALDINE JONES**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$155,798 in government benefits intended for L.F., who was deceased; of which \$103,356 was SSA benefits and \$52,442 was VA benefits to which the defendant knew she was not entitled.

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, Sections 641, set forth in this information, defendant

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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 \$155,798.

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