

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-441
v.	:	DATE FILED: _____
DEBRA LIGHTFOOT,	:	VIOLATIONS:
a/k/a "A. T. B."	:	18 U.S.C. § 1343 (wire fraud - 11 counts)
	:	18 U.S.C. § 641 (conversion of government funds - 1 count)
	:	42 U.S.C. § 408(a)(4) (Social Security fraud - 1 count)
	:	42 U.S.C. § 408(a)(7)(B) (Social Security fraud - 1 count)
	:	18 U.S.C. § 1028A (aggravated identity theft - 1 count)
	:	18 U.S.C. § 875(c) (transmitting a threat by interstate communications - 1 count)
	:	18 U.S.C. § 111(a) (assaulting, resisting, opposing, impeding, intimidating, or interfering with a government employee in the course of her official duties - 1 count)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNTS ONE THROUGH ELEVEN

(Wire Fraud)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this indictment:

1. The Social Security Administration ("SSA"), an agency of the United

States, administered certain government benefit programs, including the Disability Insurance Benefit ("DIB") program, pursuant to Title 42, United States Code, Sections 401-433.

2. The DIB 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 became "disabled" and paid sufficient Social Security taxes to become "insured," as those terms were defined for purposes of the Social Security Act, he or she was eligible to receive disability insurance benefits, which were designed to replace part of the individual's earnings lost due to disability.

3. DIB payments continued unless the disabled individual's "disability" improved, or until the disabled individual returned to work or died.

4. Defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," applied for DIB benefits in or about July 1989, under her true name and Social Security number ("SSN"), xxx-xx-4235. Defendant LIGHTFOOT was subsequently approved for DIB benefits, with a disability onset date of in or about July 1988. Defendant LIGHTFOOT has been receiving DIB benefits since this approval. In or about July 2006, defendant LIGHTFOOT purchased a home on Audrey Drive in Lititz, Pennsylvania.

THE SCHEME TO DEFRAUD

5. From in or about October 1998 through on or about May 3, 2013, defendant

DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"

devised and intended to devise a scheme to defraud the SSA and to obtain money from the SSA by fraudulently converting to her own use government disability insurance benefits she was not

entitled to receive because she concealed and failed to accurately report to the SSA that she was employed and earning income, by working under the name and SSN of an individual known to the grand jury and identified herein as "A.B." When defendant LIGHTFOOT used the name and SSN of A.B., she used variations of the true A.B.'s name, most often a name known to the grand jury and identified herein as "A.T.B."

6. It was the object of the scheme described in paragraph 5 for defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," to receive DIB payments that she was not entitled to receive.

MANNER AND MEANS

It was part of the scheme that:

7. Defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," protectively filed for DIB payments from the SSA in or about July 1989, under SSN xxx-xx-4235. Defendant LIGHTFOOT was subsequently approved by the SSA with a disability onset date of in or about July 1988.

8. In filing for DIB benefits, defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," alleged that she was disabled and unable to work.

9. Since at least October 1998, defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," has secured employment using the name of "A.T.B.," and her SSN, xxx-xx-9186.

10. Defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," did not report this work activity to the SSA.

11. From in or about August 2004 through on or about May 3, 2013, defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," received DIB payments from the SSA via a wire transfer of funds that would electronically deposit her DIB payments into her bank account. Prior to in or

about August 2004, defendant LIGHTFOOT received her DIB payments via U.S. Treasury Check, which were mailed to her.

12. From in or about October 1998 through on or about May 3, 2013, defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," failed to report and fraudulently concealed from the SSA her work activity, which she secured under the name "A.T.B.," and A.B.'s SSN, xxx-xx-9186.

13. Had defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," truthfully reported her work activity and income, she would not have been entitled to any DIB payments from at least in or about October 1999 through on or about May 3, 2013.

14. From in or about October 1999 through on or about May 3, 2013, defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," fraudulently received approximately \$137,665 in DIB payments that she was not entitled to receive.

15. From in or about August 2004, through on or about May 3, 2013, in the Eastern District of Pennsylvania, and elsewhere, defendant

DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds representing benefit payments from the SSA to the defendant LIGHTFOOT, as described below, each transaction constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE TRANSACTION</u>
1	November 3, 2008	Payment in the amount of \$752.00 transferred by wire from Baltimore, MD, to Hyattsville, MD, to Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
2	January 2, 2009	Payment in the amount of \$821.00 transferred by wire from Baltimore, MD, to Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
3	June 3, 2009	Payment in the amount of \$821.00 transferred by wire from Baltimore, MD, to Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
4	February 3, 2010	Payment in the amount of \$1027.00 transferred by wire from Baltimore, MD, to Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
5	June 3, 2010	Payment in the amount of \$1027.00 transferred by wire from Baltimore, MD, to Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
6	January 3, 2011	Payment in the amount of \$1232.00 transferred by wire from Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
7	June 3, 2011	Payment in the amount of \$1232.00 transferred by wire from Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
8	January 3, 2012	Payment in the amount of \$1364.00 transferred by wire from Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
9	June 1, 2012	Payment in the amount of \$1354.00 transferred by wire from Kansas City, MO, to East Rutherford, NJ, to Wilmington, DE, to the Eastern District of Pennsylvania
10	January 3, 2013	Payment in the amount of \$1417.00 transferred by wire from Kansas City, MO, to East Rutherford, NJ, to Pittsburgh, PA, to the Eastern District of Pennsylvania
11	May 3, 2012	Payment in the amount of \$1417.00 transferred by wire from Kansas City, MO, to East Rutherford, NJ, to Camp Hill, PA, to the Eastern District of Pennsylvania

All in violation of Title 18, United States Code, Section 1343.

COUNT TWELVE

(Conversion of Government Funds)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 14 of Counts One through Eleven of this indictment are realleged here.

2. Beginning in or about October 1999, through on or about May 3, 2013, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$137,665.00 in DIB payments from the SSA that she was not entitled to receive.

In violation of Title 18, United States Code, Section 641.

COUNT THIRTEEN

(Social Security Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 14 of Counts One through Eleven of this indictment are realleged here.

2. Beginning in or about October 1998 through on or about May 3, 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"

in a matter within the jurisdiction of the Social Security Administration, an agency of the executive branch of the United States, knowingly concealed and failed to disclose to the SSA that she was working under the name "A.T.B.," and the SSN xxx-xx-9186, with the intent to obtain DIB payments to which she was not entitled.

In violation of Title 42, United States Code, Section 408(a)(4).

COUNT FOURTEEN

(Social Security Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 14 of Counts One through Eleven of this indictment are realleged here.

2. In or about January 2012, defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," obtained employment with St. Barnabas Hospital, located in Bronx, NY, while she continued to live on Audrey Drive in Lititz, Pennsylvania. Defendant LIGHTFOOT applied for and obtained this job using the name "A.T.B.," and the Social Security Number xxx-xx-9186.

3. The Social Security Number used by defendant DEBRA LIGHTFOOT, a/k/a "A.T.B.," in obtaining this job did not belong to her, but rather was the true Social Security number of A.B.

4. In or about January 2012, in the Eastern District of Pennsylvania and the Southern District of New York, defendant

**DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"**

with intent to deceive, and for the purpose of obtaining employment with St. Barnabas Hospital, falsely represented that a Social Security account number with the last four digits 9186 had been assigned to her by the Commissioner of Social Security when in fact such number was not the Social Security account number assigned to her.

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

COUNT FIFTEEN

(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 14 of Counts One through Eleven, and Paragraphs One through Three of Count Fourteen are realleged here.

2. From in or about October 1998 through in or about May 2013, in the Eastern District of Pennsylvania and in the Southern District of New York, defendant

DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"

knowingly and without lawful authority used a means of identification of another person, that is, the Social Security number (xxx-xx-9186), during and in relation to wrongful conversion of government funds, in violation of 18 U.S.C. § 641; wire fraud, in violation of 18 U.S.C. § 1343; and Social Security fraud, in violation of 42 U.S.C. § 408(a)(7)(B).

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(1), (5), and (11).

COUNT SIXTEEN

(Transmitting a Threat by Interstate Communications)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about October 3, 2013, in the Eastern District of Pennsylvania and the District of South Carolina, defendant

**DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"**

knowingly and willfully transmitted in interstate commerce a communication containing a threat to injure or kill, that is, threatening on a phone call placed by defendant LIGHTFOOT in the District of South Carolina to a government employee located in Lancaster, Pennsylvania, in the Eastern District of Pennsylvania, that "this is exactly why people go postal, and if you want to construe this as a threat, you can," in connection with benefits that had been discontinued as a result of Lightfoot's previous indictment for fraud,

In violation of Title 18, United States Code, Section 875(c).

COUNT SEVENTEEN

**(Assaulting, Resisting, Opposing, Impeding, Intimidating,
or Interfering with a Government Employee
in the course of her Official Duties)**

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about October 3, 2013, in the Eastern District of Pennsylvania and the District of South Carolina, defendant

**DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"**

knowingly and forcibly assaulted, resisted, opposed, impeded, intimidated, or interfered with an officer of the United States, as designated in Title 18, United States Code, Section 1114, that is, an employee of the Social Security Administration known to the grand jury and identified herein as "N.M.," while the employee was engaged in the performance of her official duties at the Social Security Administration's Lancaster, Pennsylvania District Office.

In violation of Title 18, United States Code, Section 111(a)(1).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 641 and 1343, set forth in this indictment, defendant

**DEBRA LIGHTFOOT,
a/k/a "A.T.B.,"**

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 \$137,665.00.

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).

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE D. MEMEGER
United States Attorney