

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

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 15-___
v.	:	
SHIRLEY GREGG GOLDWIRE	:	DATE FILED: 3/20/2015
	:	
	:	VIOLATION:
		18 U.S.C. § 641 (conversion of government funds – 2 counts)
		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 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. The husband of defendant SHIRLEY GREGG GOLDWIRE, Fredrick Am Goldwire, received RSI benefits during his lifetime. The SSA issued Fredrick Am Goldwire's RSI benefits via wire deposit into his Wells Fargo bank account.

5. Fredrick Am Goldwire died on or about July 29, 1998. Upon his death, no other individual was entitled to receive his benefit payments.

6. After Fredrick Am Goldwire's death, SSA continued to make his benefit payments via wire deposit into his bank account. Subsequent to his death, defendant SHIRLEY GREGG GOLDWIRE accessed the SSA benefit payments intended for her deceased husband, originally through use of a debit/ATM card and by forging his name on checks tied to the bank account. In or about August 2007, defendant GOLDWIRE had her name added to this bank account as Power of Attorney.

7. In or about May 2012, SSA attempted to contact Fredrick Am Goldwire, and stopped his Social Security benefits upon suspicion that he was deceased. When interviewed by federal law enforcement agents on or about September 3, 2014, defendant SHIRLEY GREGG GOLDWIRE admitted that her husband was dead, and that she had accessed the bank account where the Social Security benefits intended for her husband were deposited.

8. Beginning in or about July 1998 and continuing through in or about May 2012, in the Eastern District of Pennsylvania and elsewhere, the defendant

SHIRLEY GREGG GOLDWIRE

knowingly converted to her own use money of the United States in excess of \$1,000, that is,

approximately \$157,485 in SSA benefits that were intended for Fredrick Am Goldwire, who was deceased, to which the defendant knew she was not entitled.

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

COUNT TWO

(Conversion of Government Funds)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are realleged here.
2. An individual identified herein as "A.T." was known to Fredrick Am Goldwire prior to his death. A.T. received RSI benefit payments via wire deposit into her Citizens Bank bank account, which was held jointly with Fredrick Am Goldwire. A.T. died prior to Fredrick Am Goldwire. Upon her death, no other individual was entitled to receive her benefit payments.
3. After the death of A.T., SSA continued to make her benefit payments via wire deposit into her bank account. Subsequent to the death of Fredrick Am Goldwire, defendant SHIRLY GREGG GOLDWIRE began accessing the SSA benefit payments intended for the deceased A.T., through the use of the debit/ATM card associated with the account.
4. In or about June 2012, upon suspicion of A.T.'s death, the SSA ceased payment of A.T.'s SSA benefits.
5. Beginning in or about July 1998 and continuing through in or about June 2012, in the Eastern District of Pennsylvania and elsewhere, the defendant

SHIRLEY GREGG GOLDWIRE

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$106,536 in SSA benefits that were intended for A.T., who was deceased, 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, Section 641, set forth in this information, defendant

SHIRLEY GREGG GOLDWIRE

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 \$264,021.

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).

for Taylor Spinal
ZANE DAVID MEMEGER
United States Attorney