

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 18-171
v. * SECTION: "R"
JERRY CAMPBELL *
* * *

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
2019 FEB -6 P 1:15
WILLIAM W. BLEVINS
CLERK
juv

FACTUAL BASIS

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant.

The government would establish that Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The Social Security Administration ("SSA") was a government agency responsible for the management of the Social Security program, as defined in the Social Security Act.

The government would establish that the case against **JERRY CAMPBELL** ("**CAMPBELL**") began as a result of a complaint to the SSA's District Office in Terrytown, LA regarding possible fraud involving **CAMPBELL**. An individual related to defendant **CAMPBELL** reported to the SSA that **JERRY CAMPBELL**, was in possession of his late sister's Chase Bank ATM card and was withdrawing money from her account.

The SSA District Office notified the Inspector General ("OIG") for the SSA after determining that Cora Campbell had been receiving Title XVI Supplemental Security Income ("SSI") disability benefits for obesity. SSA-OIG agents determined Cora's benefits were

electronically deposited into her Chase Bank account. The SSA-OIG confirmed Cora Campbell was the sister of the defendant and she died on November 8, 2013.

On January 22, 2018, SSA-OIG and State Police investigators interviewed **CAMPBELL** at his Avondale residence. **CAMPBELL** executed a written *Miranda* rights waiver and agreed to speak with the investigators. During the interview, **CAMPBELL** said he used his sister's ATM card to pay for his personal bills. **CAMPBELL** admitted to knowing that he was not entitled to his sister's Social Security money.


The SSA determined that Campbell fraudulently obtained \$32,836 in SSI disability benefits from his sister's Chase Bank account.

Various records and testimonial evidence, including testimony from representatives of the SSA-OIG and other witnesses would also be admitted to prove the facts set forth above.



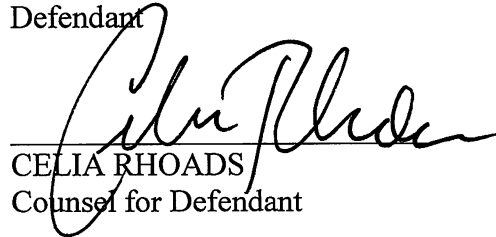
BRIAN M. KLEBBA
Assistant United States Attorney

2/6/19
Date



JERRY CAMPBELL
Defendant

2/16/19
Date



CELIA RHOADS
Counsel for Defendant

2/6/19
Date