

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA. 5K
2019 MAR 28 A 11:23
WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**SEALED
FELONY**

**INDICTMENT FOR THEFT OF
GOVERNMENT FUNDS, FALSE STATEMENT IN AN
APPLICATION FOR A PASSPORT, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

DARRYL SANDERS
a/k/a Daryl Saunders

* CRIMINAL NO: **19-00058**
* SECTION: **SECT. A MAG. 4**
* VIOLATIONS: 18 U.S.C. § 641
* 18 U.S.C. § 1542
* * *

The Grand Jury charges that:

COUNT 1

THEFT OF GOVERNMENT FUNDS

A. AT ALL TIMES MATERIAL HEREIN:

1. 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.

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Process _____
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2. Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The SSA operated the Supplemental Security Income Disability Program (“SSID”).

3. The Social Security number (“SSN”) was created in 1936 for the purpose of tracking earnings histories of U.S. workers, for use in determining Social Security benefit entitlement, and computing benefit levels. The SSN has become one of the most common means of identification in the United States. The SSN has been adopted throughout government and the private sector as a primary means of identifying and gathering information about an individual.

4. On or about July 31, 1991, **DARRYL SANDERS, a/k/a Daryl Saunders (“SANDERS”)**, obtained a SSN from the SSA after he submitted a fraudulent State of Louisiana Certificate of Live Birth.

5. Beginning in or about 2013, **SANDERS** filed for and later became eligible for SSA SSID benefits. **SANDERS** applied for the SSA benefits using the fraudulently obtained SSN.

6. **SANDERS** received monthly SSA disability benefits in the amount of approximately \$771.00, which were deposited into **SANDERS’** bank account.

B. THE OFFENSE:

Beginning in or about December 2013, and continuing until the date of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendant, **DARRYL SANDERS**, did knowingly embezzle, steal, purloin, and convert to his use, money belonging to the United States and a department and agency thereof, namely the SSA, to which he knew he was not entitled, when he submitted a fraudulent application for SSA benefits that contained a false name, false date of birth, and a fraudulently obtained Social Security number, and as a result, he was paid

approximately \$44,838.00 in SSA SSID benefits; all in violation of Title 18, United States Code, Section 641.

COUNT 2

FALSE STATEMENT IN AN APPLICATION FOR A PASSPORT

A. AT ALL TIMES MATERIAL HEREIN:

The allegations made in Part A of Count 1 are hereby realleged and incorporated herein by reference.

B. THE OFFENSE:

On or about the 27th day of March 2018, in the Eastern District of Louisiana and elsewhere, the defendant, **DARRYL SANDERS**, willfully and knowingly made a false statement in an application for a passport with the intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated his name was Daryl Saunders, with a date of birth of 09/03/1958, which statements he knew to be false; all in violation of Title 18, United States Code, Section 1542.

NOTICE OF FORFEITURE

1. The allegations of Counts 1-2 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641, 1542, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1-2, the defendant, **DARRYL SANDERS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all

property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Sections 641 and 1542.

3. 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 person;
- 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 subdivided without difficulty;

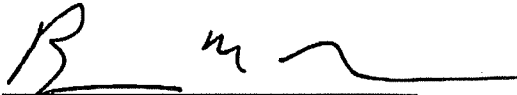
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641, 1542, and 981(a)(1)(C),
made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL: 


FOREPERSON ✓

PETER G. STRASSER
UNITED STATES ATTORNEY



BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
March 28, 2019