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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA

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WILLIAM W. BLEVINS
cc

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**SUPERSEDING INDICTMENT FOR CONSPIRACY TO COMMIT
THEFT OF GOVERNMENT FUNDS AND TO MAKE FALSE STATEMENTS,
THEFT OF GOVERNMENT FUNDS, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

ELIJAH CHARLES SORINA
LISA SORINA

* CRIMINAL NO. 18-59

* SECTION: G

* VIOLATIONS: 18 U.S.C. § 371
18 U.S.C. § 641
18 U.S.C. § 1001(a)(3)

* * *

The Grand Jury charges that:

COUNT 1

**CONSPIRACY TO COMMIT THEFT OF
GOVERNMENT FUNDS AND TO MAKE FALSE STATEMENTS**

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 of 1935.
2. Social Security was a social insurance program that provided eligible applicants with retirement, disability, and survivor benefits. The SSA operated the Retirement, Survivors, and Disability Insurance ("RSDI") program.

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3. Beginning in or about January 1998, the defendant, **ELIJAH CHARLES SORINA** ("**ELIJAH SORINA**" or "**ELIJAH**"), filed for and later became eligible for SSA benefits.

4. **ELIJAH SORINA's** mother, **LISA SORINA** ("**LISA**"), was **ELIJAH's** designated Representative Payee for his SSA benefits.

B. THE CONSPIRACY:

Beginning at a time unknown, and continuing until on or about March 16, 2018, in the Eastern District of Louisiana and elsewhere, the defendants, **ELIJAH SORINA** and **LISA SORINA**, willfully and knowingly did combine, conspire, confederate, and agree:

1. to embezzle, steal, purloin, and convert to their own use, money belonging to the United States and a department and agency thereof, namely the SSA, to which they knew **ELIJAH SORNIA** was not entitled, when they obtained approximately \$19,897.00 in SSA benefits, in violation of Title 18, United States Code, Section 641; and
2. to make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the SSA, in violation of Title 18, United States Code, Section 1001(a)(3).

C. OVERT ACTS IN FURTHURANCE OF THE CONSPIRACY:

1. In or about May 2013, **ELIJAH SORINA** applied for, and was issued, a Commercial Driver's License ("CDL") by the Louisiana Department of Public Safety and Corrections, Office of Motor Vehicles.

2. On his application for a CDL, **ELIJAH SORINA** claimed he had no mental or physical problems that would compromise his ability to operate a commercial vehicle.

3. Beginning in or about May 2014, **ELIJAH SORINA** began working as a commercial school bus driver for a local transportation company.

4. On or about December 29, 2014, **ELIJAH SORINA** purchased an International school bus.

5. On or about September 21, 2015, **ELIJAH SORINA** and **LISA SORINA** completed a Work Activity Report for the SSA that contained false statements regarding **ELIJAH SORINA's** employment.

6. On or about November 5, 2015, **ELIJAH SORINA** and **LISA SORINA**, completed a Continuing Disability Report for the SSA that contained false statements regarding **ELIJAH's** employment and daily activities.

7. On or about December 9, 2015, **ELIJAH SORINA** registered an International school bus with the Louisiana Department of Public Safety and Corrections, Office of Motor Vehicles.

8. **ELIJAH SORINA** and **LISA SORINA** failed to notify the SSA of **ELIJAH's** employment and earnings from the local transportation company, thereby allowing him to continue to collect SSA benefits unlawfully.

9. On or about March 14, 2016, **ELIJAH SORINA** made false statements to a Psychologist hired by the SSA when **ELIJAH** claimed he "does not know" if he ever had a driver's license.

10. On or about March 14, 2016, **ELIJAH SORINA** made false statements to a Psychologist hired by the SSA when **ELIJAH** claimed he was not working and had never been employed.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

THEFT OF GOVERNMENT FUNDS

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. THE OFFENSE:

Beginning in or about May 2014, and continuing until in or about August 2016, in the Eastern District of Louisiana and elsewhere, defendants, **ELIJAH SORINA** and **LISA SORINA**, did knowingly embezzle, steal, purloin, and convert to their own use, money belonging to the United States and a department and agency thereof, namely the SSA, to which they knew they were not entitled, when they obtained approximately \$19,897.00 in SSA benefits.

All in violation of Title 18, United States Code, Section 641.

COUNT 3

FALSE STATEMENTS

A. AT ALL TIMES MATERIAL HEREIN:

The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. THE OFFENSE:

On or about September 21, 2015, in the Eastern District of Louisiana and elsewhere, defendants, **ELIJAH SORINA** and **LISA SORINA**, did willfully and knowingly make and use a false writing and document, knowing the same to contain materially false, fictitious, and fraudulent statements and entries in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the SSA, when they completed a Work Activity Report (Form SSA-821-BK) in which they concealed **ELIJAH SORINA**'s employment with a local transportation company and falsely claimed that **ELIJAH** had stopped working due to his "physical and/or mental condition." The statements and representations in this document were false because **ELIJAH** and **LISA** then and there knew that **ELIJAH** has been working as a school bus driver for a local transportation company since approximately May 2014.

All in violation of Title 18, United States Code, Section 1001(a)(3).

NOTICE OF FORFEITURE

1. The allegations of Counts 1-2 of this Superseding 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 371, 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Counts 1-2, defendants, **ELIJAH SORINA** and **LISA SORINA**, 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 371 and 641.


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 371, 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

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New Orleans, Louisiana
June 21, 2019