UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 21-145

v. * SECTION: "T"(5)

CATHERINE CAMPBELL WILLIAMS *

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 allegation in the Indictment now pending against the defendant, charging her with one count of violating Title 18, United States Code, Section 641.

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 CATHERINE CAMPBELL WILLIAMS ("WILLIAMS") began after the State of Louisiana complied with a request from SSA to provide the SSA with death data of approximately 1.6 million Social Security number holders who had died in Louisiana from January 1, 1979, through December 31, 2019. As part of that data, the State of Louisiana disclosed that ..., a participant in the SSA's Retirement Survivor Insurance program ("RSI Program"), died on or about December 26, 2010.

Unaware of death, the SSA erroneously released approximately \$61,324.00 in RSI Program funds from December 2010, through December 2021, via automatic wire transfers (i.e.,

Defense Counsel

direct deposit) to Hancock Whitney Bank ("Whitney") jointly held bank account daughter, was the joint account holder of the Whitney account WILLIAMS, RSI Program benefits were not transferrable to WILLIAMS. The SSA-OIG conducted a review of records for the Whitney account pursuant to a federal grand jury subpoena. According to this review, bank statements from January 1, 2011 through August 31, 2020 established the account was jointly held by WILLIAMS. Records further reflected that at the beginning of each month, from January 2011 through August 2020, RSI Program benefits were deposited into the account. From 2013 to 2020, WILLIAMS also had recurring monthly deposits from her employer deposited into this same account as the RSI Program benefits. Following the automatic deposit of RSI Program benefits, WILLIAMS accessed the funds and wrongfully converted them to her own personal use, depleting nearly all account funds. WILLIAMS never advised the SSA of death. Additionally, on or about April 29, 2020, a COVID Economic Impact Relief Payment of WILLIAMS also wrongfully converted and \$1,200.00 was deposited into the account for used this deposit from IRS Treasury fund. On or about April 20, 2021, SSA-OIG Special Agents | WILLIAMS in a non-custodial setting. After agreeing that she understood that the interview was voluntary, In total, the government would establish that WILLIAMS knowingly converted

> Defendant Cur Defense Counsel 5.50

\$61,324.00 in RSI Program benefits intended for 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.

Limited Nature of Factual Basis and Conclusion

This proffer of evidence is not intended to constitute a complete statement of all facts known by WILLIAMS, and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by WILLIAMS.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, Special Agents and forensic examiners from the Social Security Administration, Office of the Inspector General, and admissible tangible exhibits in the custody of the SSA-OIG.

READ AND APPROVED:

MARIA M. CARBONI

, (D

Assistant United States Attorney

SAMUEL SCILLITANI

(Date)

Counsel for Defendant

CATHERINE CAMPBELL WILLIAMS

Date

Defendant