

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 15-\_\_\_**  
                  **v.** :  
**JOHNSIE BOONE-BROWN** : **DATE FILED:**  
  :  
  **VIOLATION:**  
  **18 U.S.C. § 641 (conversion of government**  
  **funds – 1 count)**  
  **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 mother of defendant JOHNSIE BOONE-BROWN, identified in this information as "T.B.," received RSI benefits during her lifetime. The SSA issued T.B.'s RSI benefits via wire deposit into her bank account.

5. T.B. died on or about May 11, 2009. Upon T.B.'s death, no other individual was entitled to receive T.B.'s benefit payments.

6. After T.B.'s death, SSA continued to make her benefit payments via wire deposit into her bank account, which was held only in T.B.'s name. Subsequent to T.B.'s death, defendant JOHNSIE BOONE-BROWN accessed the SSA benefit payments intended for her deceased mother, through use of the debit/ATM card tied to the account.

7. SSA terminated T.B.'s RSI benefits payments in or about April 2014.

8. Between in or about May 2009 and in or about April 2014, defendant JOHNSIE BOONE-BROWN improperly received and converted to her own use approximately \$22,569.86 in SSA benefit payments that were intended for T.B., who was deceased, which defendant BOONE-BROWN knew she was not entitled to receive.

9. Beginning in or about May 2009 and continuing through in or about April 2014, in the Eastern District of Pennsylvania and elsewhere, the defendant

**JOHNSIE BOONE-BROWN**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$22,569.86 in SSA benefits that were intended for T.B., 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

**JOHNSIE BOONE-BROWN**

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 \$22,569.86.

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).

---

**ZANE DAVID MEMEGER**  
**United States Attorney**