

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

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UNITED STATES OF AMERICA,)
)
)
v.)
)
ELLA MAE WOODS)
Defendant.)

Crim. No. 2:22-cr-105-1

(18 U.S.C. §§ 641, 1343)

INDICTMENT

The grand jury charges:

1. Until her death on January 2, 1994, Jeannette Styles lived in Brattleboro, Vermont. At the time of her death, Styles was receiving a monthly benefit payment of \$679.10 from the United States Social Security Administration. Styles' right to receive that monthly benefit payment terminated with her death.

2. ELLA MAE WOODS is the daughter of Jeannette Styles, and at the time of Styles' death, WOODS also lived in Brattleboro, Vermont.

3. SSA did not learn of Jeannette Styles' death until recently and, through June 2022, continued to make monthly benefit payments to Styles. Those monthly payments increased on an annual basis and in 2022 were \$1280.10. In total, SSA has made benefit payments in Styles' name, after her death, of more than \$328,000.

4. ELLA MAE WOODS fraudulently obtained, stole and converted to her own use the benefit payments SSA improperly made after Styles' death. Among other things, in 2002, WOODS opened a joint account at TD Bank in Brattleboro. WOODS named as account holders herself and her dead mother. WOODS forged Styles' signature on the bank signature card. Thereafter, WOODS deposited, or caused to be deposited, Styles' SSA payments into the joint account, and used those funds for her own benefit and enjoyment.

5. Beginning in October 2007, and continuing through March 2020, SSA deposited Styles' monthly payment into the TD Bank account via Automated Clearing House (ACH) electronic transactions from the United States Treasury. WOODS used all of that fraudulently-obtained money for her own use and enjoyment.

6. In March 2020, WOODS opened an account in the name of Jeannette Styles at Comerica Bank. At about the same time, WOODS opened a similar account at Comerica Bank in her own name. The mailing address for both accounts was the same post office box in Brattleboro. Between April 2020 and June 2022, SSA deposited more than \$26,000 into the Styles account at Comerica Bank. WOODS used some of that fraudulently-obtained money for her own benefit and enjoyment.

COUNT 1

7. Beginning in approximately January 1992 and continuing through March 2020, in the District of Vermont and elsewhere, the defendant ELLA MAE WOODS, having devised the above-described scheme and artifice to defraud the United States Social Security Administration, and for obtaining money from the Social Security Administration by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme, caused the monthly electronic transfer of funds, in interstate commerce from the United States Treasury outside Vermont, to a TD Bank account in Vermont controlled by WOODS.

(18 U.S.C. §§ 1343 & 2)

COUNT 2

8. Beginning no later than September 2017 and continuing through March 2020, in the District of Vermont, the defendant ELLA MAE WOODS knowingly stole and converted to her own use the following monthly benefit payments made by the Social Security Administration to Jeannette Styles:

<u>APPROXIMATE DATE</u>	<u>AMOUNT</u>
September 2017	\$1012 <i>GLW</i>
October 3, 2017	\$1012
November 3, 2017	\$1012
December 1, 2017	\$1012
January 3, 2018	\$1012
February 2, 2018	\$1012
March 2, 2018	\$1012
April 3, 2018	\$1012
May 3, 2018	\$1012
June 1, 2018	\$1012
July 3, 2018	\$1012
August 3, 2018	\$1012
August 31, 2018	\$1012
October 3, 2018	\$1012
November 2, 2018	\$1012
December 3, 2018	\$1012
January 3, 2019	\$1039
February 1, 2019	\$1039
March 1, 2019	\$1039
April 3, 2019	\$1039
May 3, 2019	\$1039
June 3, 2019	\$1039
July 3, 2019	\$1039
August 2, 2019	\$1039
September 3, 2019	\$1039
October 3, 2019	\$1039
November 1, 2019	\$1039
December 3, 2019	\$1039
January 3, 2020	\$1049
February 3, 2020	\$1049
March 3, 2020	\$1049

(18 U.S.C. § 641)

A TRUE BILL

[REDACTED]

FOR PERSON

[REDACTED]

Nikolas P. Kerest

NIKOLAS P. KEREST (GLW)
United States Attorney

Burlington, Vermont
September 15, 2022