

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**LAFAYETTE FREDERICK KEATON,  
aka JEROME GARNETT KEATON,**

**Defendant.**

CR'10-064-KI

Case No: \_\_\_\_\_

**INDICTMENT**

18 U.S.C. § 641  
18 U.S.C. § 981(a)(1)(C)  
28 U.S.C. § 2461(c)  
42 U.S.C. § 408(a)(6)

**THE GRAND JURY CHARGES:**

**COUNT 1**

[Social Security Fraud - False Information]

On or about March 9, 2005, within the District of Oregon, **LAFAYETTE FREDERICK KEATON**, defendant herein, did willfully and knowingly, with intent to deceive as to his true identity, furnished false information to the Social Security Administration, to wit: On or about March 9, 2005, in the District of Oregon, **LAFAYETTE FREDERICK KEATON** submitted, or caused to be submitted, to the Social Security Administration, an application for a social security card, falsely representing himself to be Jerome Keaton, and falsely representing a full nine-digit social security number, summarized here as XXX-XX-8487, to be his own when he knew it was not; all in violation of Title 42, United States Code, Section 408(a)(6).

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**COUNT 2**  
[Theft of Government Funds]

Beginning in or about March 1997 and continuing through January 2010, within the District of Oregon, **LAFAYETTE FREDERICK KEATON**, defendant herein, did knowingly and willfully steal and convert to his own use, money of the United States Treasury, a department and agency of the United States, to wit: by receiving Supplemental Security Income benefits in an amount greater than \$1,000.00 based on fraudulent representations and concealments; all in violation of Title 18, United States Code, Section 641.

**FORFEITURE ALLEGATION**

Upon conviction of the offense alleged in count two of this Indictment, **LAFAYETTE FREDERICK KEATON**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the said violation.

If any of the above-described forfeitable property, 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;

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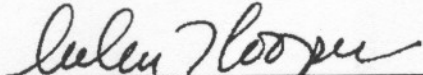
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

Dated this 22 day of February 2010.

A TRUE BILL.

  
OFFICIATING FOREPERSON

Presented by:  
DWIGHT C. HOLTON, OSB #09054  
United States Attorney  
District of Oregon

  
HELEN L. COOPER, OSB #871957  
Special Assistant United States Attorney