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FILED
U.S. DISTRICT COURT
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2013 OCT 16 P 5:09

UNITED STATES OF AMERICA

CLERK'S OFFICE
AT BALTIMORE

CRIMINAL NO. RDB-13-0560

v.

FREDERICUS HUBERTUS SLICHER,
a/k/a Frederick Slicher,
a/k/a Fredericus Hubertus,

* (Theft of Government Property,
* 18 U.S.C. § 641; Possession of a
* Forged Naturalization Certificate,
* 18 U.S.C. § 1426; Election Fraud,
* 18 U.S.C. § 611)
*

Defendant

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to the charges in this Indictment:

1. The Social Security Administration ("SSA") was an independent agency of the United States within the United States government which administered programs under the Social Security Act, Title 42, United States Code, Section 301, et seq. ("the Act"). These programs included the Social Security Old-Age, Survivors, and Disability Insurance and related programs under Title II of the Act ("Title II Programs").

2. The Title II Programs included the Retirement Insurance Benefits Program, which paid monthly cash benefits to individuals who had worked and paid taxes into Social Security. To be eligible for monthly cash benefits, individuals must have reached the age of 62 and paid a portion of their prior wages into the program. Benefits were determined based on average salary and number of years of employment.

3. Medicare was a federal health care insurance program for U.S. citizens age 65 and older, as well as some younger individuals with disabilities, which was administered by the Department of Health and Human Services (“HHS”), a department within the executive branch of the United States government. Medicare offered multiple forms of health care benefits, including a defined benefit plan for hospital services (Part A) and a defined benefit plan for outpatient medical services (Part B). Medicare also offered a defined benefit prescription drug plan (Part D). Individual eligibility for Medicare was determined by SSA. Medicare paid hospitals, clinics, and other health care providers directly for services they provided to Medicare beneficiaries.

4. Defendant **FREDERICUS HUBERTUS SLICHER** (“**SLICHER**”), a resident of Middle River, Maryland, was born in 1936 in the Netherlands, and was a citizen and national of the Netherlands. **SLICHER** first entered the United States from the Netherlands in November 1967 on a visitor visa. **SLICHER** was later granted a temporary work visa that expired in April 1969; since that time **SLICHER** has been present in the United States without lawful authority.

5. On or about September 18, 2013, **SLICHER** was interviewed by agents of Immigration and Customs Enforcement (“ICE”), to whom **SLICHER** presented a fraudulent certificate of naturalization in his name. The fraudulent certificate of naturalization was purported to have been issued by the U.S. District Court in Baltimore, Maryland on June 8, 1974. **SLICHER** previously used the same certificate of naturalization to obtain a U.S. passport, a Social Security Account Number, and other forms of identification.

6. In or about August 2010, **SLICHER** applied for Title II Program retirement benefits at an SSA claims office in Maryland, which were approved in the amount of \$1,054 per

month beginning in or about September 2010. On his application for Title II Program benefits, **SLICHER** falsely affirmed that he was a citizen of the United States. **SLICHER** applied and was approved for Medicare Part A, B, and D benefits coincident with his application for Title II Program benefits. On his application for Medicare benefits, **SLICHER** falsely affirmed that he was a United States citizen.

7. Because it was not aware of the false statements made by **SLICHER** regarding his citizenship, between in or about September 2010 and in or about September 2013, SSA made monthly payments for Title II Program benefits to **SLICHER** when no payments were authorized. Between in or about September 2010 and in or about September 2013, SSA paid **SLICHER** a total of \$46,284 in unauthorized Title II Program benefits. SSA paid those benefits to **SLICHER** by U.S. Treasury check mailed to **SLICHER**'s home address in Middle River, Maryland until March 2013, and then paid those benefits by direct deposit to Wells Fargo Bank checking account XXXXXXXXXXX1331.

8. Because it was not aware of defendant **SLICHER**'s alienage, between in or about September 2010 and in or about September 2013, HHS paid for Medicare services provided to **SLICHER** when no benefits were authorized. Between in or about September 2010 and in or about September 2013, HHS paid health care providers a total of \$7,130 for Medicare services used by **SLICHER**.

The Charge

9. Between in or about September 2010 and in or about September 2013, in the District of Maryland, the defendant,

FREDERICUS HUBERTUS SLICHER,
a/k/a Frederick Slicher,
a/k/a Fredericus Hubertus,

did embezzle, steal, purloin, and knowingly convert to his use and the use of another, any money of the United States and any department and agency thereof, whose value exceeded \$1,000, namely Title II Program and Medicare benefits to which he was not entitled.

18 U.S.C. § 641

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Paragraphs 1 through 8 of Count One are incorporated here.
2. On or about September 18, 2013, in the District of Maryland, the defendant,

**FREDERICUS HUBERTUS SLICHER,
a/k/a Frederick Slicher,
a/k/a Fredericus Hubertus,**

possessed any false, forged, altered, antedated and counterfeited certificate and documentary evidence of naturalization purporting to have been issued under any law of the United States, and any copy thereof, knowing the same to be false, forged, altered, antedated and counterfeited and with intent unlawfully to use the same, to wit, the defendant presented to agents of Immigration and Customs Enforcement a false and forged certificate of naturalization.

18 U.S.C. § 1426(c)

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

1. The allegations contained in Paragraphs 4 and 5 of Count One are incorporated here.

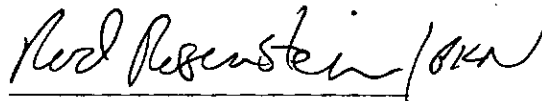
2. In or about October 1976, **SLICHER** registered to vote in state and federal elections with the Maryland State Board of Elections. Since that time **SLICHER** has voted in numerous state and federal elections, knowing that he was not a citizen of the United States and had no lawful authority to vote.

3. On or about November 6, 2012, in the District of Maryland, the defendant,

FREDERICUS HUBERTUS SLICHER,
a/k/a Frederick Slicher,
a/k/a Fredericus Hubertus,

for the purpose of electing a candidate for the office of President, Vice President, Presidential elector, Member of the Senate, and Member of the House of Representatives, and knowing himself to be an alien, voted in any election, to wit, defendant **SLICHER** cast a ballot in the 2012 federal election at a precinct in Baltimore County, MD.

18 U.S.C. § 611



Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: October 16, 2013