

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**D**

Holding a Criminal Term

Grand Jury Sworn in on January 8, 1987

**88-0226**

UNITED STATES OF AMERICA	:	Criminal No.
v.	:	Grand Jury Original
WRIGHT BRAY also known as Wrighty Bray, Jr., and as Herbert Bray	:	Violations: 18 U.S.C. § 1341 (Mail Fraud); 18 U.S.C. § 641 (Receipt of Stolen U.S. Securities); 18 U.S.C. § 495 (Uttering of Treasury Checks)

**HOGAN, J.**

I N D I C T M E N T

**FILED IN OPEN COURT**

The Grand Jury charges that:

JUN 14 1988

COUNTS ONE THROUGH FORTY-FIVE

CLERK, U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA

1. At all times material herein, the Federal Compensation Act (hereinafter FECA) provided compensation and medical benefits for all civilian employees injured or killed while in the performance of duty or due to employment related disease. These benefits include compensation for wage loss, monetary awards for bodily impairments and disfigurement, medical care, rehabilitation services and survivor's compensation. These benefits were administered by the Office of Workers' Compensation Programs (hereinafter OWCP) of the U.S. Department of Labor.

2. In 1929, Wrighty Bray, Jr., born May 8, 1904, was injured while working at the Norfolk, Virginia, Shipyard and as a result of that injury was eligible to receive and did receive workers' compensation under the Federal Employees Compensation Act until the time of his death on December 1, 1975.

3. Thereafter, from on or about December 10, 1975 to on or about March 24, 1987, within the District of Columbia and elsewhere, the defendant WRIGHT BRAY, the grandson of the above mentioned Wrighty Bray, Jr., also known as Wrighty Bray, Jr. and as Herbert Bray, devised and intended to devise a scheme and artifice to defraud the United States of America of in excess of \$60,000.00, specifically the Office of Workers' Compensation Programs of the U.S. Department of Labor, and to obtain money and property therefrom by means of false and fraudulent pretenses, representations and promises.

4. It was a part of said scheme and artifice that the defendant WRIGHT BRAY, also known as Wrighty Bray, Jr. and as Herbert Bray, would receive U.S. Treasury checks representing payments under FECA for his deceased grandfather, Wrighty Bray, Jr., forge the endorsement thereon, utter them and convert the proceeds to his own use and benefit.

5. It was a further part of said scheme and artifice that from 1975 to 1983, the defendant failed to complete form CA 1032 which had been sent to his deceased grandfather, that requested information used in determining continued eligibility for benefits. As a result, the benefits were terminated in September 1983.

6. It was a further part of said scheme and artifice that in order to get the benefits resumed on or about September 6, 1983, the defendant submitted and caused to be submitted to OWCP a false and fraudulent OA 1032 in the name of his deceased grandfather which contained information that Wrighty Bray then lived in Washington, D.C., and that he was unemployed, displaying a signature of "Wrighty Bray," and which the defendant well knew was false and fraudulent in that the defendant's grandfather was dead and no longer entitled to benefits.

7. It was a further part of said scheme and artifice that the defendant on or about March 6, 1987, submitted and caused to be submitted to OWCP a OA 1032 in the name of his deceased grandfather in which he indicated that Wrighty Bray was unemployed, that Wrighty Bray had no dependants, and it displayed a signature of "Wrighty Bray," dated April 1, 1987, and which he well knew was false and fraudulent in that the defendant's grandfather was dead and no longer entitled to benefits.

8. On or about the dates listed below under "Date" the defendant WRIGHT BRAY, also known as Wrighty Bray, Jr. and as Herbert Bray, within the District of Columbia, for the purpose of executing the aforementioned scheme and artifice, took and received from a post office and authorized depository for mail matter, a matter and thing which had been sent and delivered by the Postal Service, in each case a check as described below as to date, check number, symbol and amount.

<u>COUNT NO.</u>	<u>DATE</u>	<u>CHECK NO.</u>	<u>SYMBOL</u>	<u>AMOUNT</u>
1	11-02-83	56,352,687	3005	444.32
2	11-30-83	57,734,050	3005	444.32
3	12-28-83	07,835,459	3005	444.32
4	01-25-84	58,801,306	3005	495.00
5	02-22-84	09,115,513	3005	386.58
6	03-21-84	60,072,549	3005	438.26
7	04-18-84	10,282,086	3005	454.26
8	05-16-84	61,506,624	3005	454.26
9	06-13-84	11,625,425	3005	454.26
10	07-11-84	62,792,370	3005	454.26
11	08-08-84	12,772,605	3005	454.26
12	08-31-84	14,200,655	3005	389.38
13	09-29-84	64,866,643	3005	454.26
14	10-27-84	15,433,529	3005	454.26
15	11-24-84	66,547,423	3005	454.26
16	12-22-84	16,676,825	3005	454.26
17	01-19-85	68,119,001	3005	454.26
18	02-16-85	17,690,997	3005	454.26
19	03-16-85	69,089,975	3005	469.10
20	04-13-85	19,205,776	3005	487.10
21	05-11-85	70,411,958	3005	487.10
22	06-08-85	20,800,877	3005	487.10
23	07-06-85	72,163,873	3005	487.10
24	08-03-85	21,951,329	3005	487.10
25	08-31-85	23,242,500	3005	487.10
26	09-28-85	74,434,270	3005	487.10
27	10-26-85	24,555,502	3005	487.10
28	11-23-85	76,213,995	3005	487.10
29	12-21-85	25,791,220	3005	487.10
30	01-18-86	77,128,287	3005	487.10
31	02-15-86	26,768,732	3005	529.00
32	03-15-86	78,242,841	3005	529.00
33	04-12-86	28,154,643	3005	529.00
34	05-10-86	79,429,717	3005	529.00
35	06-07-86	28,610,678	3005	529.00
36	07-05-86	79,896,700	3005	529.00
37	08-02-86	29,011,153	3005	529.00
38	08-30-86	29,380,262	3005	529.00
39	09-27-86	80,588,142	3005	529.00
40	10-25-86	29,701,633	3005	529.00
41	11-22-86	80,968,455	3005	529.00
42	12-20-86	50,436,130	3005	529.00
43	01-17-87	50,673,808	3005	529.00
44	02-14-87	54,043,594	3005	521.62
45	03-14-87	50,931,039	3005	521.62

(Violation of Title 18, U.S. Code, Section 1341)

COUNT FORTY-SIX

1. Paragraphs One and Two of Counts One through Forty-Five of this Indictment are herein incorporated by reference.

2. Between on or about October 21, 1983, and on or about March 24, 1987, within the District of Columbia, WRIGHT BRAY, also known as Wrighty Bray, Jr. and as Herbert Bray, received, concealed and retained, forty-seven United States Treasury FECA checks payable to Wrighty Bray totalling \$21,786.48, with intent to convert the said checks to his own use and gain, well knowing the said checks to have been stolen, purloined and converted.

(Violation of Title 18, U.S. Code, Section 641)

COUNTS FORTY-SEVEN THROUGH SIXTY-FOUR

1. Paragraphs One and Two of Counts One through Forty-Five of this Indictment are herein incorporated by reference.

2. On or about the dates listed below, within the District of Columbia, WRIGHT BRAY, also known as Wrighty Bray, Jr. and as Herbert Bray, with intent to defraud the United States, uttered and published as true and genuine a paper writing in the form of United States Treasury FECA checks set forth below all payable to Wrighty Bray, Jr. drawn upon the United States Treasury, with a certain falsely made and forged endorsement in the back thereof, well knowing that the endorsement on the back thereof, had been falsely made and forged.

<u>COUNT NO.</u>	<u>DATE</u>	<u>CHECK NO.</u>	<u>SYMBOL</u>	<u>AMOUNT</u>
47	11-30-83	57,734,050	3005	\$444.32
48	08-31-84	14,200,655	3005	389.38
49	09-29-84	64,866,643	3005	454.26
50	04-13-85	19,205,776	3005	487.10
51	05-11-85	70,411,958	3005	487.10
52	06-08-85	20,800,877	3005	487.10
53	01-18-86	77,128,287	3005	487.10
54	02-15-86	26,768,732	3005	529.00
55	03-15-86	78,242,841	3005	529.00
56	04-12-86	28,154,643	3005	529.00
57	05-10-86	79,429,717	3005	529.00
58	06-07-86	28,610,678	3005	529.00
59	07-05-86	79,896,700	3005	529.00