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Clerk, U.S. District Court, ILCD

SEP 19 2017

CLERK OF COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)

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Plaintiff,)

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V.)

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DERYL WRIGHT,
Defendant

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Criminal No. 17-10046

VIO: Title 18, United States Code,
Section 1343;

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS 1 - 3
(Wire Fraud)

Introduction

1. Starting in or about late 2015 and continuing to in or about 2017,

DERYL WRIGHT lived at 1401 Camden Street, Pekin, Illinois.

2. At times material to this Indictment, D.J., the victim, lived within

two blocks of the defendant and met WRIGHT when he was going to door-to-door offering to shovel snow.

3. Starting mid-to-late 2015 and continuing to on or about April 6,

2017, D.J. provided WRIGHT with money as a loan under the premise WRIGHT would pay it back.

4. At times material to this Indictment, D.J. was vulnerable to WRIGHT's claims.

Scheme to Defraud

5. Starting at least as early as 2015 and continuing to in or about 2017, in Tazewell County, in the Central District of Illinois and elsewhere,

DERYL WRIGHT,

defendant herein, knowingly devised and intended to devise a scheme and artifice to defraud D.J. and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that such pretenses, representations, and promises were false and fraudulent when made.

6. It was a part of the scheme and artifice to defraud that WRIGHT asked D.J. to borrow various amounts of money, requesting almost always the money in cash.

7. It was a part of the scheme and artifice to defraud that WRIGHT told D.J. that WRIGHT's father had died and he was to inherit a large sum of money. WRIGHT told D.J. he would pay him back out of money he received in the inheritance check.

8. It was a part of the scheme and artifice to defraud that WRIGHT told D.J. he needed to borrow money to receive said inheritance check, for example, to pay taxes and for processing fees associated with the check before

WRIGHT could receive it. WRIGHT gave D.J. a continual source of reasons why the inheritance check was delayed and he needed more money, including, but not limited to, claiming arrests, car accidents, and hospital admissions that did not actually occur.

9. It was part of the scheme and artifice to defraud that WRIGHT claimed various reasons for delay in obtaining the inheritance check, and requested money based on these various delays, for example, requesting money for new brakes in a car so that Wright could drive to pick up the check.

10. It was part of the scheme and artifice to defraud that WRIGHT had no such inheritance check in existence; rather the money he obtained from D.J. was diverted to support his lifestyle choices.

11. It was part of the scheme and artifice to defraud that on at least three occasions, WRIGHT asked D.J. to wire him money using money transfers at Walmart in Pekin, Illinois to Walmart stores located out of state.

12. As a result of the scheme and artifice to defraud, D.J. was defrauded of approximately \$100,000.

Wire Communications

13. On or about each of the below-listed dates, in Tazewell County, in the Central District of Illinois and elsewhere,

DERYL WRIGHT,

defendant herein, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>Count</u>	<u>Date</u>	<u>Transaction</u>
1	10/7/2016	Transfer of money through MoneyGram at Walmart in Pekin, Illinois to Colorado
2	10/15/2016	Transfer of money through MoneyGram at Walmart in Pekin, Illinois to Kansas
3	10/17/2016	Transfer of money through MoneyGram at Walmart in Pekin, Illinois to Colorado

All in violation of Title 18, United States Code, Section 1343.

A True Bill,

s/ foreperson

Foreperson

s/ K.G. Legge

PATRICK D. HANSEN
ACTING UNITED STATES ATTORNEY
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