

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2016 OCT 25 P 12: 54

UNITED STATES OF AMERICA,

Plaintiff,

JON W. SANFILIPPO
CLERK

v.

16-CR-169

Case No. 16-CR-

DEAN D. YOUNG,

Defendant.

[18 U.S.C. § 1343]
Green Bay Division

INDICTMENT

THE GRAND JURY CHARGES:

1. Beginning in approximately November 2002, and continuing thereafter until at least September 2015, in the State and Eastern District of Wisconsin,

DEAN D. YOUNG

devised and carried out a scheme to defraud the United States Department of Veterans Affairs (“VA”) of pension and compensation benefits by means of materially false and fraudulent pretenses (the “scheme”), which scheme is more fully described below.

2. At all times material to this indictment:

- a. Dean D. Young resided in the Eastern District of Wisconsin and was a veteran of the United States Army, having served from February 1977 to January 1981.

- b. The VA is a Department of the United States responsible for providing federal benefits to veterans and their families. Among others, the VA administers a program which provides compensation and pension benefits to veterans for disabilities connected to their military service.

The Scheme

3. Young's scheme was essentially to defraud the VA of compensation and pension benefits by providing materially false information to the VA, at its Regional Office in Milwaukee, Wisconsin, and elsewhere, concerning his physical and mental condition. In particular, Young provided materially false information to the VA, upon which the VA relied in awarding pension and compensation benefits, including but not limited to the following information:

- a. Beginning in June 2003, Young falsely claimed that he suffered from post-traumatic stress disorder, hereinafter "PTSD," based upon his fabricated stories of witnessing a soldier being killed during a machine gun accident and a soldier's parachute malfunctioning resulting in the soldier's death.
- b. On August 30, 2013, Young falsely claimed to a VA doctor during an appointment that he required use of a wheelchair and he could only walk a few steps due to extreme back pain when in fact, the VA doctor observed Young walk with a normal gait in the parking lot after his appointment. Further, law enforcement obtained video of Young that same day recording him walking down the hallway of his apartment complex and

standing in the elevator while carrying a box, all without the aid of a wheelchair or cane.

- c. On April 3, 2014, Young told VA representatives that he could not walk without a cane and that with a cane he could only walk one or two blocks. Young also said doctors told him that eventually he would be permanently in a wheel chair. In May 2014, Young told a VA medical doctor that he could not lift, bend, or twist because of lower back pain. Further, Young said on most days he had to rest due to back pain and that he used a case because of lower back problems.
- d. In truth, Young did not require the assistance of a wheel chair and was recorded by law enforcement between May 2, 2014 and August 28, 2014, walking outside his residence without the use of a cane or wheelchair while carrying bags of ice and cases of beverages. On one occasion, in June 2014, Young and another individual lifted a large toolbox on wheels out of the back of a pick-up truck.

4. At all times relevant to the charges in this indictment, the VA paid Young his compensation benefits via electronic funds transfer, hereinafter "EFT." The EFT's were conducted using interstate wire communications initiated by the United States Department of the Treasury's financial center in Austin, Texas, and ending with an electronic deposit to Young's bank account at Harbor Credit Union in Green Bay, Wisconsin. Such EFT's were accomplished with Young's knowledge and consent, and included monthly payments.

5. As a result of the scheme, Young wrongfully obtained funds in excess of

\$400,000.

Executions of Scheme

6. On or about the dates indicated below, in the State and Eastern District of Wisconsin,

DEAN D. YOUNG

knowingly executed his scheme to defraud the VA by causing interstate wire communication, in the form of EFT's, for Young's physical and PTSD-based compensation benefits.

Count	Date	Execution of scheme
One	August 30, 2013	Wire transfer of \$2,973 from the Department of Treasury, Austin, Texas, Young's Harbor Credit Union account, Green Bay, Wisconsin.
Two	October 1, 2013	Wire transfer of \$2,973 from the Department of Treasury, Austin, Texas to Young's Harbor Credit Union account, Green Bay, Wisconsin.
Three	April 1, 2014	Wire transfer of \$3,017.60 from the Department of Treasury, Austin, Texas to Young's Harbor Credit Union account, Green Bay, Wisconsin.
Four	May 1, 2014	Wire transfer of \$3,017.60 from the Department of Treasury, Austin, Texas to Young's Harbor Credit Union account, Green Bay, Wisconsin.
Five	May 30, 2014	Wire transfer of \$3,017.60 from the Department of Treasury, Austin, Texas to Young's Harbor Credit Union account, Green Bay, Wisconsin.

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

FORFEITURE NOTICE

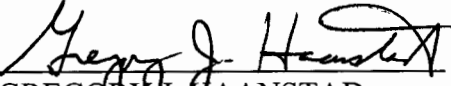
1. Upon conviction of the offense(s) in violation of Title 18, United States Code, Section 1343, set forth in Counts 1-5 of this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense(s).

2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

Date



GREGORY J. HAANSTAD
United States Attorney