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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

REDACTED FOR
PUBLIC DISCLOSURE

CR 09 80 59 PCT GMS (LDA)

INDICTMENT

United States of America,

Plaintiff,

v.

Don Wilson,

Defendant.

VIO: 18 U.S.C. § 1001(a)(3)
(False Statement)
Count 1

VIO: 18 U.S.C. § 287
(False, Fictitious and Fraudulent
Claims)
Count 2

VIO: 18 U.S.C. § 641
(Theft of Government Funds)
Count 3

THE GRAND JURY CHARGES:

COUNT 1

On or about March 21, 2007, in the District of Arizona, and elsewhere, DON WILSON, in a matter within the jurisdiction of the United States Department of Veterans Affairs, a department within the executive branch of the Government of the United States, did knowingly and willfully make a false material statement, knowing the same to be false, by completing Department of Veterans Affairs Application for Compensation and/or Pension, VA Form 21-526, falsely representing that he: served in Vietnam from 1964 to 1965; that he received leg shrapnel wounds and knee wounds, when in fact he did not serve in Vietnam and did not receive any combat wounds in Vietnam.

In violation of Title 18, United States Code, Section 1001(a)(3).

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COUNT 2

On or about March 21, 2007, in the District of Arizoan, DON WILSON made and presented to the United States Department of Veterans Affairs, a department and agency of the United States, a forged and fraudulent United States Army discharge form DD 214 with his VA Form 21-526, Application For Compensation and/or Pension to claim disability monetary benefits from the Department of Veterans Affairs paid to veterans who are injured or disabled by injuries incurred during active military service knowing such claims to be false, fictitious, and fraudulent.

In violation of Title 18, United States Code, Section 287.

COUNT 3

In and between March 2007 and April 2008, in the District of Arizona, DON WILSON, did willfully and knowingly steal, purloin, and convert to his own use, money in excess of \$55,000.00 from the United States Department of Veterans Affairs, a department and agency of the United States by receiving and continuing to receive Veterans Affairs medical and disability benefits by fraudulently claiming that he had suffered medical disabilities in the Vietnam War and that he had been awarded various medals, including the Purple Heart even though he had never served in the Vietnam War or received any wounds in the war, or been decorated for such service.

In violation of Title 18, United States Code, Section 641.

TRUE BILL

_____/S/_____

FOREPERSON OF THE GRAND JURY
Date: May 26, 2009

DIANE J. HUMETEWA
United States Attorney
District of Arizona

_____/S/_____

CHARLES F. HYDER
Assistant U.S. Attorney