

State's Witness - Austin Mayberry, CPA, CFE
Office of the State Inspector General

No. 18-CR 2869 - 5
DEKALB COUNTY SUPERIOR COURT

MAY TERM 2018

THE STATE

vs

NATASHA BRAY

and

DEVORE BRAY

D027011

Racketeering (O.C.G.A. § 16-14-4(a))

AM
FILED
2018 JUN 21 AM 10:55
CLERK OF SUPERIOR COURT
DEKALB COUNTY GA

True Bill.

James M. Gentry Foreperson.

6/21/2018 Date.

The Defendant, Natasha Bray, waives copy of the Indictment, list of witnesses, full panel, formal arraignment, and pleads

This the _____ of _____ 20____.

Prosecuting Attorney

Defendant's Attorney

Defendant

The Defendant, Devore Bray, waives copy of the Indictment, list of witnesses, full panel, formal arraignment, and pleads

_____.
This the ____ of _____ 20____.

Prosecuting Attorney

Defendant's Attorney

Defendant

STATE OF GEORGIA, COUNTY OF DEKALB

BILL OF INDICTMENT

IN THE SUPERIOR COURT OF SAID COUNTY,

The Grand Jurors selected, chosen and sworn for the County of DeKalb, to wit:

1. Stacie Greby, Foreperson
- ~~2. Elaine Agnes~~
- ~~3. Rachelle Barnett~~
4. Robert Burroughs
5. Natasha Camp
6. Elizabeth Coffey
7. Christina Daughtry
8. Lester Davis
- ~~9. Michelle DeJean~~
10. Bibiana Farizan
11. Terence Farmer
12. Antonio Gleaton
13. Robert Hackney, Jr.
- ~~14. Heather Henry~~
15. Akila Lewis
16. Curtis Lewis
17. Tanniel Robertson
18. Abigail Rudica
19. Mark Rutkowski
20. Subrata Saha
21. Antoine Simpson
22. Catlainn Sioanean
23. Douglas Smith
24. Michelle Smith
25. Florence Webb
- ~~26. Agnes Wells~~

COUNT 1

The GRAND JURORS aforesaid, in the name of and on behalf of the citizens of the State of Georgia, charge and accuse

NATASHA BRAY and DEVORE BRAY

with the offense of **RACKETEERING** in violation of **O.C.G.A. § 16-14-4(a)**, for that the said **NATASHA BRAY** and **DEVORE BRAY** (collectively "**THE ACCUSED**") in the State of Georgia and the County of DeKalb, on and between December 5, 2014, and April 12, 2017, did unlawfully through a pattern of racketeering activity and proceeds derived therefrom, acquire and maintain, directly and indirectly, an interest in and control of personal property, including money, contrary to the laws of this State, the good order, peace and dignity thereof, as follows:

Part 1 - The Scheme

1.

At all times relevant to this indictment **NATASHA BRAY** was employed by the Department of Juvenile Justice (DJJ). While **NATASHA BRAY'S** position within the DJJ changed throughout her employment, a large part of her duties included managing DJJ's fleet vehicle budget. **NATASHA BRAY** was responsible for creating and processing payment vouchers for DJJ's fleet.

2.

DEVORE BRAY is the husband of **NATASHA BRAY**. **DEVORE BRAY** opened a Wells Fargo Business checking account in the name Lowes Enterprise on December 10, 2014. Lowes Enterprise was described as a pressure washing business.

3.

THE ACCUSED caused a Lowes Enterprise Vendor Management Form with the Lowes Enterprise checking account information to be submitted to DJJ's accounting department approximately 2 months later.

4.

THE ACCUSED engaged in a scheme to acquire and maintain an interest in and control of personal property, including money, by using Lowes Enterprise to direct money to themselves by causing DJJ to pay invoices to Lowes Enterprise when no services were rendered.

5.

In furtherance of their scheme, **THE ACCUSED** falsified invoices. DJJ paid the invoices unaware **THE ACCUSED** were using Lowes Enterprise for their personal benefit and the benefit of others.

Part 2 - Acts of Racketeering Activity

6.

THE ACCUSED engaged in at least two acts of racketeering activity in furtherance of their scheme that had the same and similar intents, results, accomplices, victims, and methods of commission and were interrelated by distinguishing characteristics and were not isolated incidents.

7.

At least one of the acts of racketeering activity occurred in DeKalb County, Georgia.

8.

Said Racketeering activity included:

False Statements in violation of O.C.G.A. § 16-10-20 and constituting racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(xv) for acts occurring before July 1, 2015, and O.C.G.A. § 16-14-3(5)(A)(xxii) for acts occurring on or after July 1, 2015.

Theft by Taking in violation of O.C.G.A. § 16-8-2 and constituting racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(A)(ix) for acts occurring before July 1, 2015 and O.C.G.A. § 16-14-3(5)(A)(xii) for acts occurring on or after July 1, 2015.

Acts Involving Theft constituting racketeering activity pursuant to O.C.G.A. § 16-14-3(9)(B).

A. False Statements

9.

On and between December 5, 2014, and April 12, 2017, **NATASHA BRAY** engaged in 77 acts of False Statements in violation of O.C.G.A. § 16-10-20 by knowingly and willfully using false writings, to wit: invoices from Lowes Enterprise knowing the same to contain false, fictitious, and fraudulent statements, to wit: that Lowes Enterprise had performed work for DJJ and was owed money, in a matter within the jurisdiction of the DJJ, a department of state government. Each Lowes Enterprise invoice constitutes an act of racketeering activity as follows:

Act	Date Submitted	Invoice Number
1	12/5/2014	102467
2	12/28/2014	102479
3	1/20/2015	102498
4	2/18/2015	102506
5	3/4/2015	102538
6	3/9/2015	102538-1
7	3/16/2015	102612
8	4/3/2015	102659
9	4/13/2015	102692
10	4/20/2015	102705
11	4/30/2015	102759
12	5/12/2015	102819
13	5/19/2015	102922
14	5/28/2015	102959
15	6/4/2015	102988
16	6/8/2015	102994
17	6/16/2015	103015
18	6/23/2015	103067
19	7/7/2015	103125
20	7/21/2015	103195
21	7/21/2015	103239
22	8/4/2015	103554
23	8/4/2015	103572
24	8/12/2015	103662

Act	Date Submitted	Invoice Number
25	8/18/2015	103944
26	8/26/2015	103968
27	9/2/2015	1040003
28	9/10/2015	104098
29	9/21/2015	104112
30	10/15/2015	104233
31	10/21/2015	104339
32	11/3/2015	104581
33	11/10/2015	105332
34	11/18/2015	105724
35	11/25/2015	105991
36	12/1/2015	106024
37	12/8/2015	106145
38	12/15/2015	106203
39	12/15/2015	106298
40	12/31/2015	106433
41	1/7/2016	106854
42	1/12/2016	106994
43	2/15/2016	107084
44	2/29/2016	107233
45	3/8/2016	108019
46	3/22/2016	108340
47	4/5/2016	108599
48	4/12/2016	108422
49	4/27/2016	109023
50	5/17/2016	109348
51	6/2/2016	109872
52	6/9/2016	109996
53	6/13/2016	102014
54	6/20/2016	102246
55	6/27/2016	102444
56	7/19/2016	102593
57	7/29/2016	102744
58	8/15/2016	110038
59	8/15/2016	110112
60	9/7/2016	110288
61	9/29/2016	110234
62	9/29/2016	110105
63	9/29/2016	110293
64	9/30/2016	110301
65	10/6/2016	110331
66	11/3/2016	110193
67	11/10/2016	110910
68	11/10/2016	110982
69	11/23/2016	110433
70	12/2/2016	111004

Act	Date Submitted	Invoice Number
71	12/13/2016	111096
72	12/20/2016	111128
73	1/25/2017	111294
74	2/13/2017	111320
75	3/8/2017	111393
76	4/12/2017	111687
77	4/12/2017	111841

B. Acts Involving Theft

10.

Act 78. On or about December 10, 2014, **DEVORE BRAY** did engage in an Act Involving Theft when he opened Wells Fargo Business Checking Account Number XXXXXX3780 in the name of Lowes Enterprise for the purpose of facilitating the theft of property for the benefit of himself and the benefit of others.

C. Theft by Taking

11.

On and between December 5, 2014, and, April 12, 2017, **THE ACCUSED** engaged in 76 acts of Theft by Taking in violation of O.C.G.A. § 16-8-2 by unlawfully taking money, the property of DJJ, with the intention of depriving DJJ of said property. Said property is further described as the money DJJ paid to Lowes Enterprise. Each transaction constitutes an act of racketeering activity as follows:

Act	Date	Payment Details	Amount
79	12/10/2014	Check No.: 64297	\$1,317.87
80	12/30/2014	Check No.: 64827	\$1,409.85
81	1/22/2015	Check No.: 65479	\$620.00
82	2/20/2015	ACH ID 53697	\$760.00
83	3/6/2015	ACH ID 54195	\$1,160.00
84	3/11/2015	ACH ID 54360	\$1,040.00
85	3/19/2015	ACH ID 54651	\$1,200.00
86	4/3/2015	ACH ID 55192	\$1,440.00
87	4/15/2015	ACH ID 55581	\$1,590.00
88	4/21/2015	ACH ID 55822	\$1,985.00
89	5/4/2015	ACH ID 56146	\$2,460.00
90	5/14/2015	ACH ID 56701	\$2,080.00

Act	Date	Payment Details	Amount
91	5/21/2015	ACH ID 56951	\$1,560.00
92	6/1/2015	ACH ID 57194	\$895.00
93	6/5/2015	ACH ID 57415	\$1,825.00
94	6/11/2015	ACH ID 57625	\$1,865.00
95	6/18/2015	ACH ID 57970	\$1,575.00
96	6/25/2015	ACH ID 58209	\$2,100.00
97	7/7/2015	ACH ID 58474	\$2,425.00
98	7/24/2015	ACH ID 59128	\$3,570.00
99	8/4/2015	ACH ID 59310	\$1,545.00
100	8/5/2015	ACH ID 59368	\$1,862.00
101	8/13/2015	ACH ID 59665	\$2,130.00
102	8/19/2015	ACH ID 59815	\$2,365.00
103	8/26/2015	ACH ID 60049	\$2,230.00
104	9/3/2015	ACH ID 60335	\$2,420.00
105	9/10/2015	ACH ID 60570	\$2,380.00
106	9/22/2015	ACH ID 60976	\$2,488.00
107	10/15/2015	ACH ID 62011	\$2,348.00
108	10/22/2015	ACH ID 62256	\$2,175.00
109	11/4/2015	ACH ID 62747	\$2,495.00
110	11/12/2015	ACH ID 63118	\$2,250.00
111	11/19/2015	ACH ID 63364	\$2,330.00
112	11/27/2015	ACH Id 63603	\$2,310.00
113	12/3/2015	ACH ID 63712	\$2,290.00
114	12/9/2015	ACH ID 64039	\$2,488.00
115	12/16/2015	ACH ID 64368	\$4,635.00
116	1/4/2016	ACH ID 64902	\$2,440.00
117	1/11/2016	ACH ID 65164	\$2,491.00
118	1/14/2016	ACH ID 65339	\$3,585.00
119	2/16/2016	ACH ID 66455	\$2,455.00
120	3/2/2016	ACH ID 66984	\$1,680.00
121	3/10/2016	ACH ID 67299	\$2,340.00
122	3/22/2016	ACH ID 67773	\$2,435.00
123	4/6/2016	ACH Id 68297	\$2,490.00
124	4/6/2016	ACH Id 68297	\$2,490.00
125	4/13/2016	ACH ID 68590	\$4,855.00
126	4/19/2016	ACH ID 68840	\$3,275.00
127	5/18/2016	ACH ID 69833	\$3,110.00
128	6/3/2016	ACH ID 70327	\$4,532.00
129	6/10/2016	ACH ID 70622	\$4,865.00
130	6/15/2016	ACH ID 70799	\$4,340.00
131	6/20/2016	ACH ID 71023	\$3,720.00
132	6/27/2016	ACH ID 71238	\$3,270.00
133	7/20/2016	ACH ID 72001	\$4,835.00

Act	Date	Payment Details	Amount
134	7/29/2016	ACH ID 72102	\$4,320.00
135	8/10/2016	ACH ID 72446	\$3,795.00
136	8/15/2016	ACH ID 72661	\$3,210.00
137	9/6/2016	ACH ID 73248	\$3,890.00
138	9/8/2016	ACH ID 73395	\$4,850.00
139	9/14/2016	ACH ID 73672	\$2,490.00
140	9/21/2016	ACH ID 73949	\$3,825.00
141	10/3/2016	ACH ID 74318	\$3,285.00
142	10/7/2016	ACH ID 74737	\$3,110.00
143	10/14/2016	ACH ID 74853	\$4,735.00
144	10/26/2016	ACH ID 75257	\$7,375.00
145	11/4/2016	ACH ID 75561	\$3,305.00
146	11/9/2016	ACH ID 75805	\$7,715.00
147	11/23/2016	ACH ID 76297	\$3,250.00
148	12/2/2016	ACH ID 76528	\$3,580.00
149	12/14/2016	ACH ID 76955	\$4,260.00
150	12/21/2016	ACH ID 77183	\$4,410.00
151	1/26/2017	ACH ID 78339	\$4,880.00
152	2/13/2017	ACH ID 79005	\$3,200.00
153	3/9/2017	ACH ID 79954	\$4,655.00
154	4/12/2017	ACH ID 81126	\$9,075.00

Part 3 - The Property

12.

Through their pattern of racketeering activity, **THE ACCUSED** did acquire and maintain approximately \$222,233.85 in personal property.

CHRISTOPHER M. CARR
Attorney General
State of Georgia