

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

FRANKLYN D. BRADLEY II : VIOLATIONS:

18 U.S.C. § 510(a)(1)
(Forging endorsement on
Treasury checks - 1 count)
18 U.S.C. § 641
(Conversion of government
funds - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. The Social Security Administration was an agency of the United States responsible for the payment of benefits, including Social Security benefits.
2. Prior to her death in or around July 1983, Edna R. Bradley was receiving monthly United States Treasury checks in payment of her Social Security benefits.
3. After Edna R. Bradley's death, the monthly United States Treasury checks continued to arrive at her home address, payable to Edna R. Bradley.
4. The defendant FRANKLYN D. BRADLEY II was Edna R. Bradley's son, and was living with her at the time of her death.
5. From in or about July 1983, through in or about May 2003, at Philadelphia,

in the Eastern District of Pennsylvania, defendant

FRANKLYN D. BRADLEY II,

with intent to defraud, did falsely make and forge the endorsement “Edna R. Bradley” on over 200 United States Treasury checks with an aggregate face value exceeding \$1,000, that is, Social Security benefit payments totaling \$164,309.50.

In violation of Title 18, United States Code, Section 510(a)(1).

COUNT 2

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1-4 of Count 1 are realleged herein.
2. On or about April 3, 2003, at Philadelphia, in the Eastern District of

Pennsylvania, defendant

FRANKLYN D. BRADLEY II

knowingly converted to his own use a thing of value of the United States, that is, United States Treasury Check number 2050 46647720, payable to Edna R. Bradley, in the amount of \$830.00, which constituted a payment not properly due him.

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

PATRICK L MEEHAN
United States Attorney