

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

DAVID CHARLES BREDA, JR.,

§
§
§
§
§

CRIMINAL NO.

H-09-363

**UNSEALED
PER ARREST**

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order.

INTRODUCTION

United States Courts
Southern District of Texas
FILED

JUN 25 2009

At all times material to this Indictment:

1. The term "sexual contact" is defined, pursuant to Title 18, United States Code, Section 2246(3), as "the intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person."

GENERAL ALLEGATIONS

2. On or about October 8, 2008, defendant, **DAVID CHARLES BREDA, JR.**, was employed by or accompanied the Armed Forces outside the United States, as defined in Title 18, United States Code, Section 3267(1), that is, the Defendant was employed by Services Employees International, Incorporated, a subsidiary of Kellogg Brown & Root, a contractor of the Department of Defense.
3. The acts described in the Indictment occurred in and around Al Asad Air Base, Iraq.
4. The conduct described in the Indictment would have constituted an offense punishable by imprisonment for more than one year if the conduct had been engaged in within the special maritime and

territorial jurisdiction of the United States.

5. Venue for the offense charged in Count One of this Indictment lies in the Southern District of Texas.

COUNT ONE
Abusive Sexual Contact
18 U.S.C. § § 2244(a)(1), 3261(a)(1)

On or about October 8, 2008, at Al Asad Air Base, Iraq, the defendant,

DAVID CHARLES BRED A, JR.

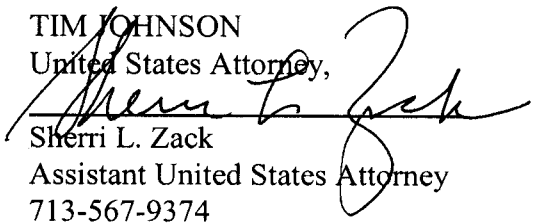
did knowingly engage in and cause sexual contact, as defined in Title 18, United States Code, § 2246(3), with the victim, R.W., by intentionally touching R.W.'s breasts, thighs and groin, directly and through her clothing, with an intent to abuse, humiliate, and degrade R.W. and to gratify his sexual desire, said sexual contact being done by force against the will of R.W. by **David Charles Bred a, Jr.** which conduct would have constituted an offense under Title 18, United States Code, Section 2241(1) had it been a sexual act and engaged in within the special maritime and territorial jurisdiction of the United States.

All in violation of Title 18, United States Code, Section 2244(a)(1) and 3261(a)(1).

A True Bill:

ORIGINAL SIGNATURE ON FILE

Grand Jury Foreperson

By: 
TIM JOHNSON
United States Attorney,
Sherri L. Zack
Assistant United States Attorney
713-567-9374