

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. _____
v.)	
)	Violations: Title 18, United
REVA K. VERA)	States Code, Section 1341

COUNT ONE

The MARCH 2013 GRAND JURY charges:

1. At times material to this Indictment
 - a. Defendant Reva K. Vera was employed as the shipping manager for American Extrusion International (“AEI”) located in South Beloit, Illinois. As shipping manager, defendant was responsible for authorizing payments to vendors who provided shipping services to AEI.
 - b. Defendant maintained a post-office box in the name of TQL Total Quality Logistics at the Post Office in Loves Park, Illinois.
2. Beginning approximately May 4, 2012, and continuing to on or about October 9, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

REVA K. VERA,

defendant herein, knowingly devised and intended to devise a scheme to defraud and to obtain money from AEI by means of materially false and

fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was the object of this scheme for defendant to fraudulently obtain approximately \$352,743.23 from AEI.

4. It was further a part of the scheme that defendant created purchase orders using AEI's accounting system computer software for shipping services purportedly provided by two fraudulent companies that defendant created, Val Tech, Inc. and TQL.

5. It was further part of the scheme that defendant created fictitious invoices from Val Tech, Inc. and TQL for shipping services that those companies had purportedly performed for AEI when in fact, Val Tech, Inc. and TQL provided no such shipping services for AEI. The fictitious invoices matched the purchase orders to Val Tech, Inc. and TQL that defendant had previously created.

6. It was further part of the scheme that defendant sent the fictitious purchase orders and invoices to AEI's accounts payable department causing checks to be issued by AEI payable to Val Tech, Inc. or TQL in the amount of the invoice.

7. It was further a part of the scheme that defendant provided AEI an address in Beloit, Wisconsin that belonged to defendant's relative as the address for Val Tech, Inc ("Beloit address").

8. It was further a part of the scheme that defendant provided AEI with TQL's post-office box number in Loves Park, Illinois ("Loves Park address").

9. It was further a part of the scheme that after AEI's accounts payable department generated the checks for the fictitious invoices submitted by defendant, AEI mailed the checks payable to Val Tech, Inc. to the Beloit, Wisconsin address and the checks payable to TQL to the Loves Park address.

10. It was further a part of the scheme that on June 9, 2012, defendant opened a checking account at Associated Bank in the name of "Reva K. Vera, DBA Valtech" ("Associated Bank account"). On December 6, 2012, defendant changed the title of the Associated Bank account to "Reva K. Vera, DBA Total Quality Lineup."

11. It was further a part of the scheme that defendant obtained \$85,993 in checks from AEI that were made payable to Val Tech, Inc. that defendant cashed or deposited into her Associated Bank account.

12. It was further a part of the scheme that defendant obtained \$266,810.23 in checks from AEI that were made payable to TQL that defendant cashed or deposited into her Associated Bank account.

13. It was further a part of the scheme that after defendant deposited the AEI checks payable to Val Tech, Inc. or TQL into her Associated Bank

account, defendant withdrew the money from the Associated Bank account and used the money for her personal benefit.

14. On or about June 8, 2012, at South Beloit, Illinois, in the Northern District of Illinois, Western Division,

REVA K. VERA,

defendant herein, for the purpose of executing the aforesaid scheme to defraud and to obtain money by false and fraudulent pretenses, representations, and promises, and attempting to do so, knowingly did cause to be sent by United States mail, according to the direction thereon to Beloit, Wisconsin, an envelope addressed to Val Tech, Inc., which contained First National Bank and Trust Company check no. 42480 payable to Val Tech, Inc. in the amount of \$4,856.46;

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

The MARCH 2013 GRAND JURY further charges:

1. Paragraphs 1 through 13 of Count One of this Indictment are re-alleged and incorporated as if fully repeated here.

2. On or about October 4, 2013, at South Beloit, Illinois, in the Northern District of Illinois, Western Division,

REVA K. VERA,

defendant herein, for the purpose of executing the aforesaid scheme to defraud and to obtain money by false and fraudulent pretenses, representations, and promises, and attempting to do so, knowingly did cause to be sent by United States mail, according to the direction thereon to Loves Park, Illinois, an envelope addressed to TQL, which contained First National Bank and Trust Company check no. 47207 payable to TQL, in the amount of \$2,872.10;

In violation of Title 18, United States Code, Section 1341.

TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY