RECEIVED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y

MRM:CPK F. #2025R00200

★ MAY 29 2025

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

UNITED STATES OF AMERICA

- against -

TONY REAM,

also known as "Tony Ream-Hendley" and "Tony Moul Ream,"

Defendant.

Cr. No. CR25

(T. 18, U.S.C., §§ 981(a)(1)(C), 982(a)(1), 982(b)(1), 1343, 1957, 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

BULSARA, J.

TISCIONE, M.J.

THE GRAND JURY CHARGES:

#### INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

### I. The Defendant and His Employer

- 1. The defendant TONY REAM, also known as "Tony Ream-Hendley" and "Tony Moul Ream," was a credit supervisor at Corporation A, an entity whose identity is known to the Grand Jury. Corporation A was a Delaware corporation with its principal place of business in Melville, New York. Corporation A was a worldwide distributor of medical and dental supplies.
- 2. In or about June 2019, the defendant TONY REAM was hired by Corporation A in their credit department. In 2020, REAM became a credit supervisor at Corporation A. As a credit supervisor at Corporation A, REAM was given authority to enter into financial transactions to, among other things, issue refunds to customers.

#### II. The Fraudulent Scheme

- 3. In or about and between October 2020 and November 2024, the defendant TONY REAM, without authorization, sent or caused to be sent wire transfers totaling approximately \$1.6 million from Corporation A's Bank Account at Bank of New York Mellon ("Corp. A BNY Account") to a bank account he controlled in his name (the "Ream Account").
- 4. At Corporation A, a customer credit was established when a customer was due a refund based on an overpayment, mischarges or a returned product. When Corporation A owed a customer credit, it was usually refunded to the customer or applied to an existing or future balance. The defendant TONY REAM had authority from Corporation A to initiate and/or approve credit disbursements from customers' accounts for refunds on Corporation A's behalf.
- 5. As part of the scheme to defraud, the defendant TONY REAM, together with others, fraudulently sent funds belonging to Corporation A, that were intended to be credited to customers, to the Ream Account. REAM concealed his misappropriation of funds to the Ream Account from his supervisors at Corporation A.
- 6. At times, to conceal and continue his fraud, the defendant TONY REAM directed subordinates at Corporation A to initiate a refund. After the refund was initiated, REAM approved it and disbursed the refund to the Ream Account.
- 7. In total, the defendant TONY REAM caused the unauthorized transfer of approximately \$1.6 million dollars from the Corp. A BNY Account to the Ream Account.

  REAM spent these stolen funds on, among other things, his wedding, renovation of a restaurant and luxury international vacations.

### COUNT ONE (Wire Fraud)

- 8. The allegations contained in paragraphs one through seven are realleged and incorporated as if fully set forth in this paragraph.
- 9. In or about and between October 2020 and November 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant TONY REAM, also known as "Tony Ream-Hendley" and "Tony Moul Ream," together with others, did knowingly and intentionally devise a scheme and artifice to defraud Corporation A and to obtain money and property from Corporation A by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, transmitted and cause to be transmitted by means of wire communication in interstate commerce, one or more writings, signs, signals, pictures and sounds, to wit: wires transmitting funds from the Corp. A BNY Account to the Ream Account.

(Title 18, United States Code, Sections 1343, 2 and 3551 et seq.)

# COUNT TWO (Illegal Monetary Transactions)

- 10. The allegations contained in paragraphs one through seven are realleged and incorporated as if fully set forth in this paragraph.
- 11. In or about and between October 2020 and November 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant TONY REAM, also known as "Tony Ream-Hendley" and "Tony Moul Ream," together with others, did knowingly and intentionally engage in monetary transactions, in and affecting interstate commerce, in criminally derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity, to wit: wire fraud, in violation of Title

18, United States Code, Section 1343, knowing that the property involved in such monetary transactions represented the proceeds of some form of unlawful activity.

. 3

(Title 18, United States Code, Sections 1957, 2 and 3551 et seq.)

## CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

- 12. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.
- 13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

## CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

- 14. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property.
- 15. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code,

Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

By David Pitluck, Assistant U.S. Attorney

JOSEPH NOCELLA, JR.
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK