

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

| | | |
|--------------------------|---|------------------|
| UNITED STATES OF AMERICA | : | Hon. |
| | : | |
| v. | : | Crim. No. 19- |
| | : | |
| MUAMER RECI | : | 18 U.S.C. § 1349 |
| a/k/a "Mel Reci" | : | |

INFORMATION
(Conspiracy to Commit Wire Fraud)

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

Individuals and Entities

a. Corporate Victim 1 was a corporation that maintained a technology center in Piscataway, New Jersey. Corporate Victim 1 researched, developed, designed, manufactured, marketed, and sold oral care consumer products in over two hundred countries and territories around the world. Corporate Victim 1’s oral care products generated substantial annual revenues.

b. Defendant MUAMER RECI (“RECI”) was a resident of Haskell, New Jersey. RECI worked as a research technician and scientist for Corporate Victim 1 from in or about September 1997 through in or about December 2018. As a research scientist for Corporate Victim 1, RECI was responsible for, among other things, conducting lab analysis, experiments, and

research on Corporate Victim 1's oral care products. As a research scientist, RECI had access to Corporate Victim 1's confidential and economically valuable business information, including the database containing proprietary formulas and manufacturing processes for Corporate Victim 1's products.

c. RECI owed a fiduciary duty to Corporate Victim 1 whose Code of Conduct required him not to disclose trade secrets or other confidential information, including formulas, to third parties not employed by Corporate Victim 1 or to use this information for the benefit of himself or third parties.

The Conspiracy

2. From in or around November 2015 through in or around December 2018, in Passaic County, in the District of New Jersey, and elsewhere, the defendant

MUAMER RECI,
a/k/a "Mel Reci,"

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud Corporate Victim 1 of its right to defendant RECI's honest services in the performance of defendant RECI's duties, and, for the purpose of executing such scheme and artifice to defraud, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Sections 1343 and 1346.

Goal of the Conspiracy

3. The goal of the conspiracy was for defendant RECI to use his position as a research technician and scientist for Corporate Victim 1's oral care products to deprive Corporate Victim 1 of his honest services and to enrich himself by misappropriating and monetizing Corporate Victim 1's trade secrets relating to toothpaste.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that RECI and his coconspirators established a consumer hygiene and cleaning products company, Reci & Sons, which, in or around November 2015, established a subsidiary in Macedonia named Reci Enterprises. RECI never disclosed the existence of Reci & Sons or Reci Enterprises to Corporate Victim 1.

5. It was further part of the conspiracy that RECI and his coconspirators developed a business plan for Reci Enterprises to develop, manufacture, and sell a toothpaste named Eurodent (the "Eurodent Business Plan"). The Eurodent Business Plan listed as one of its "Objectives" to "Launch Reci Enterprises research labs, and manufacturing complex to the public by fourth quarter of Year 2017." The Eurodent Business Plan valued the business "at roughly \$2,000,000."

6. It was further part of the conspiracy that RECI and his coconspirators agreed to employ RECI as the head of research and development at Reci Enterprises in exchange for RECI misappropriating proprietary

toothpaste formulas from Corporate Victim 1.

7. It was further part of the conspiracy that RECI sent several emails to a coconspirator, attaching Corporate Victim 1's proprietary toothpaste formulas for existing products and for an unreleased product of Corporate Victim 1 as well as proprietary laboratory procedures for Corporate Victim 1's products. For example, on or about August 9, 2017, RECI sent an email to a coconspirator, attaching proprietary toothpaste formulas belonging to Corporate Victim 1.

8. It was further part of the conspiracy that, to execute and attempt to execute the conspiracy, defendant RECI sent and caused to be sent numerous interstate wire communications, which were transmitted into and out of the District of New Jersey.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

1. As the result of committing the offense constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), as alleged in this Information, defendant MUAMER RECI shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the wire fraud conspiracy offense, and all property traceable thereto, including, but not limited to, a sum of money equal to at least \$188,384.45 in United States currency.

Substitute Assets Provision

2. 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.


CRAIG CARPENITO
United States Attorney

CASE NUMBER: _____

**United States District Court
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UNITED STATES OF AMERICA

v.

MUAMER RECI

INFORMATION FOR

18 U.S.C. § 1349

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