

RETURN OF INFORMATION

Please present this form to the Magistrate Judge or his Deputy Clerk at the time your return is made.

DATE: June 29, 2015

CRIMINAL DEFENDANT

WARRANT/SUMMONS ASSIGNED
AUSA

CR15-62 S

RONALD HUNT

SUMMONS

TPD

LDA

FILED

JUN 29 2015

U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

NAME OF MAGISTRATE JUDGE RETURNED BEFORE: _____

IF APPLICABLE, SUMMONSES TO BE RETURNED BEFORE:

DATE AND TIME SUMMONSES TO BE RETURNED: _____

Please return this form to GALE JAMES in the U.S. Attorney's Office with the pertinent information or call her with the information at 709-5023.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

FILED
JUN 29 2015
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

RONALD HUNT,
Defendant.

Cr. No.

In violation of 18 U.S.C. § 1343

(Wire Fraud)

CR 15

62 S

INFORMATION

The United States Attorney Charges that:

At all times material to this Information:

1. From June 2009 to October 2013, Defendant RONALD HUNT was employed as a customer support specialist for Columbia Management Investment Services (CMIS) at their Providence, Rhode Island call center. CMIS is a subsidiary of Ameriprise Financial and is responsible for managing and servicing mutual fund accounts for Ameriprise Financial clients. CMIS and Ameriprise Financial operated in interstate and foreign commerce.

2. In and around March of 2013, HUNT, with the purpose of defrauding CMIS and its clients, used his position as a customer support specialist with CMIS to research deceased clients who had unredeemed Ameriprise Financial mutual fund accounts and no listed beneficiaries. HUNT identified two such Ameriprise Financial mutual fund accounts which belonged to two deceased sisters who had resided in Galway, Ireland.

3. On or about May 13, 2013, HUNT applied for a new business bank account with TD Bank, which had branches in the district of Rhode Island, under the name "Celtic Savings", which had an address located in Bristol, Rhode Island. On May 15, 2013, HUNT applied for a mutual fund account with Vanguard, also under the name "Celtic Savings".

4. On May 19, 2013, HUNT submitted the necessary redemption paperwork for the two sisters' CMIS accounts. HUNT defrauded CMIS by using the alias "Sean Kane" as the fictitious executor for both accounts. On this same day, HUNT, using the "Sean Kane" alias, applied for two mutual fund accounts with CMIS under the sisters' names.

5. On May 20, 2013, HUNT, using the fictitious "Sean Kane" alias as executor, transferred a total of \$769,242.24 from one sister's Ameriprise Financial mutual fund account into a CMIS account. Additionally, HUNT transferred \$459,531.91 from the second sister's Ameriprise Financial account into a CMIS account. The total amount fraudulently transferred by HUNT was \$1,228,774.15.

6. On May 21, 2013, HUNT, again using the alias "Sean Kane", transferred this total, \$1,228,774.15, via a wire transfer from Ireland to the United States, from the CMIS accounts into the "Celtic Savings" TD Bank account controlled by HUNT.

7. On May 23, 2013 and again on August 29, 2013, HUNT caused checks totaling \$750,000.00, drawn from his "Celtic Savings" TD Bank account, to be deposited into his "Celtic Savings" Vanguard account.

COUNT ONE

8. On or about May 21, 2013, in the District of Rhode Island and elsewhere, the defendant RONALD HUNT, for the purpose of executing a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, knowingly transmitted and caused \$1,228,774.15, more or less, to be transmitted by means of wire communication in interstate and foreign commerce from Ireland to Rhode Island.

All in violation of 18 U.S.C. §§ 1343 and 2.

PETER F. NERONHA
United States Attorney



ADI GOLDSTEIN
Assistant U.S. Attorney
Chief of the Criminal Division



TERRENCE P. DONNELLY
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

FILED
JUN 29 2015
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

RONALD HUNT

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CR. No.

CR 15

62 S

PLEA AGREEMENT

Pursuant to Rule 11(c)(1)(B) of the Federal Rules of Criminal Procedure, the United States and Defendant, RONALD HUNT have reached the following agreement:

1. Defendant's Obligations:

a. Defendant will waive presentation of this matter to a grand jury and consent to the filing of a one-count Information which charges defendant with Wire Fraud, 18 U.S.C. § 1343. Defendant agrees to plead guilty to said Information. Defendant further agrees that the time between the filing of this plea agreement and the scheduled date for the change of plea is excludable under the Speedy Trial Act, 18 U.S.C. § 3161.

2. Government's Obligations. In exchange for Defendant's plea of guilty:

a. The government will recommend that the Court impose a term of imprisonment within the range of sentences for the offense level determined by the Court under the United States Sentencing Guidelines (the U.S.S.G. or "guidelines").

b. For purposes of determining the offense level, the government agrees to recommend a two-level reduction in the offense level for acceptance of responsibility under § 3E1.1(a) of the guidelines if Defendant continues to demonstrate acceptance of responsibility through sentencing.

c. As of the date of this agreement, Defendant has timely notified authorities of an intention to enter a plea of guilty. If the offense level is 16 or greater and Defendant enters a plea of guilty pursuant to this agreement, the government will move the sentencing Court for an additional decrease of one level, pursuant to U.S.S.G. § 3E1.1(b)(2), unless Defendant indicates an intention not to enter a plea of guilty, thereby requiring the government to prepare for trial.

d. The government is free to recommend any combination of supervised release, fines, and restitution which it deems appropriate.

3. Defendant understands that the guidelines are not binding on the Court, and that, although the Court must consult the guidelines in fashioning any sentence in this case, the guidelines are only advisory, and the Court may impose any reasonable sentence in this matter up to the statutory maximum penalties after taking into account the factors enumerated in 18 U.S.C. § 3553(a).

4. Specific Agreements:

a. The United States and defendant agree to recommend to the Court that the amount of loss in this case is more than \$1,000,000 but less than \$2,500,000; namely, \$1,228,773.43.

5. The maximum statutory penalty for the offense to which defendant is pleading are:

Count 1 – Wire Fraud, 18 U.S.C. § 1343

20 years imprisonment, a fine of up to \$250,000, a term of supervised release of 3 years, and a mandatory special assessment of \$100.

6. Defendant agrees that, after Defendant and Defendant's counsel sign this agreement, counsel will return it to the United States Attorney's Office along with a money order or certified check, payable to the Clerk, United States District Court, in payment of the special assessments. Failure to do so, unless the Court has made a previous finding of indigence, will relieve the government of its obligation to recommend a reduction in the offense level under the guidelines for acceptance of responsibility.

7. Defendant is advised and understands that:

a. The government has the right, in a prosecution for perjury or making a false statement, to use against Defendant any statement that Defendant gives under oath;

b. Defendant has the right to plead not guilty, or having already so pleaded, to persist in that plea;

c. Defendant has the right to a jury trial;

d. Defendant has the right to be represented by counsel – and if necessary have the

Court appoint counsel – at trial and every other stage of the proceeding;

e. Defendant has the right at trial to confront and cross-examine adverse witnesses, to be protected from self-incrimination, to testify and present evidence, and to compel the attendance of witnesses; and

f. Defendant waives these trial rights if the Court accepts a plea of guilty.

8. The government reserves its full right of allocution, including the right to present any information to the Court for its consideration in fashioning an appropriate sentence, the right to

correct misstatements, misrepresentations, or omissions by Defendant, and to answer any questions asked by the Court.

9. Except for paragraphs 2 and 4, above, the parties have made no agreement concerning the application of the guidelines in this case.

10. Defendant understands that the Court alone makes all sentencing decisions, including the application of the guidelines and the sentence to be imposed. The Court is not bound by the parties' stipulations of fact, offense level adjustments, or the government's recommendations. The Court is free to impose any sentence it deems appropriate up to and including the statutory maximum. Defendant also understands that even if the Court's guideline determinations and sentence are different than Defendant expects, Defendant will not be allowed to withdraw Defendant's plea of guilty.

11. Defendant hereby waives Defendant's right to appeal the convictions and sentences imposed by the Court, if the sentences imposed by the Court are within or below the sentencing guideline range determined by the Court. This agreement does not affect the rights or obligations of the United States as set forth in 18 U.S.C. § 3742(b), and the government retains its right to appeal any of the Court's sentencing determinations.

12. This agreement is binding on the government only if Defendant pleads guilty, fulfills all Defendant's obligations under the agreement, does not engage in any conduct constituting obstruction of justice under § 3C1.1 of the guidelines, and does not commit any new offenses. Defendant understands that if Defendant violates this agreement in any way, the government shall be released from its obligations under the agreement and will be free to make any recommendations

that it deems appropriate. If that occurs, Defendant shall not have the right to withdraw Defendant's guilty plea.

13. This agreement is limited to the District of Rhode Island and does not bind any other federal, state, or local prosecutive authorities.

14. This agreement constitutes the entire agreement between the parties. No other promises or inducements have been made concerning the plea in this case. Defendant acknowledges that no person has, directly or indirectly, threatened or coerced Defendant to enter this agreement. Any additions, deletions, or modifications to this agreement must be made in writing and signed by all the parties in order to be effective.

15. Counsel for Defendant states that Counsel has read this agreement, been given a copy of it for Counsel's file, explained it to Defendant, and states that to the best of Counsel's knowledge and belief, Defendant understands the agreement.

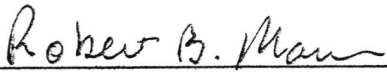
16. Defendant states that Defendant has read the agreement or has had it read to

Defendant, has discussed it with Defendant's Counsel, understands it, and agrees to its provisions.



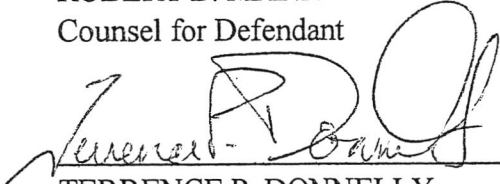
RONALD HUNT
Defendant

6/02/15
Date



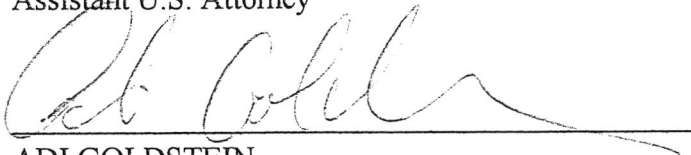
ROBERT B. MANN
Counsel for Defendant

6/11/15
Date



TERRENCE P. DONNELLY
Assistant U.S. Attorney

6/24/15
Date



ADI GOLDSTEIN
Assistant U.S. Attorney
Chief, Criminal Division

6/24/15
Date

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☒ INFORMATION ☐ INDICTMENT ☐ COMPLAINT CASE NO. 15 62 SMatter Sealed: ☐ Juvenile ☐ Other than Juvenile☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person PETER F. NERONHA
Furnishing Information on ☒ U.S. Atty ☐ Other U.S. Agency
THIS FORM Phone No. 5045Name of Asst. TERRENCE P. DONNELLY
U.S. Attorney
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

U.S. Secret Service

☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☐ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.Place of
offense RHODE ISLAND

County

USA vs.

Defendant: Ronald HuntAddress: Collinsville, Illinois 62234☐ Interpreter Required Dialect: _____Birth 1970 ☒ Male ☐ Alien
Date 1970 ☐ Female (if applicable)Social Security Number 972

DEFENDANT

Issue: ☐ Warrant ☒ Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

☐ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ FugitiveDefense Counsel (if any): Robert B. Mann, Esq.☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. §§ 1343 and 2	Wire Fraud	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
Max	Penalty: 20 years imprisonment; fine of up to	\$250,000; 3 years supervised release; & \$100 assessment	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor