

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
NORTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 22-10042

Plaintiff,

REDACTED INDICTMENT

vs.

Wire Fraud

REVA PLUNKETT,

18 U.S.C. § 1343

Defendant.

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The Grand Jury charges:

Counts 1 – 13.

A. Introduction:

Beginning on or about January 2015 and continuing through February 2022, all dates approximate and inclusive, in the District of South Dakota and elsewhere, the Defendant, Reva Plunkett, devised and intended to devise a scheme and artifice to defraud and to obtain money and property from others by means of false and fraudulent pretenses, representations, and promises, and caused communications to be sent and did knowingly use and cause communications to be transmitted in interstate commerce, by means of electronic wire communications, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice to defraud.

B. Object of the Scheme and Artifice:

The object of the Defendant's scheme and artifice to defraud was to unjustly enrich herself by obtaining fraudulent funds.

C. Manner and Means of the Scheme and Artifice:

1. From approximately 2008 through on or about February 2022, Defendant was the bookkeeper for Doug's Anchor Marine, Inc., a business located in Watertown, South Dakota. From approximately 2012 through on or about February 2022, Defendant was the bookkeeper for Brotherhood Arms, a business located in Watertown, South Dakota. In the Defendant's capacity as bookkeeper for each business, Defendant was responsible for managing and reconciling various business accounts. Defendant's duties included writing checks to pay for business expenses, such as payroll and vendor payments.

2. On multiple occasions during the relevant time period, Defendant falsely and fraudulently wrote checks payable to herself that were drawn on business accounts belonging to Doug's Anchor Marine, Inc. These checks were not for her wages or salary, nor were they for any other legitimate purpose. Defendant deposited the checks into her account and used the funds for her own purposes. Defendant disguised her theft by falsely and fraudulently recording in the business' accounting system that the checks were payable to vendors, which made the checks appear to be legitimate business expenses. Defendant also falsely and fraudulently adjusted the business inventory to make it appear that the money was actually spent on products for the business.

3. On multiple occasions during the relevant time period, Defendant falsely and fraudulently wrote checks payable to herself that were drawn on business accounts belonging to Brotherhood Arms. These checks were not for

her wages or salary, nor were they for any other legitimate purpose. Defendant deposited the checks into her account and used the funds for her own purposes. Defendant disguised her theft by falsely and fraudulently recording in the business' accounting system that the checks were payable to vendors, which made the checks appear to be legitimate business expenses. Defendant also falsely and fraudulently adjusted the business inventory to make it appear that the money was actually spent on products for the business.

4. It was further a part of the scheme and artifice that the Defendant would and did perform acts, and make statements to promote and achieve the object of the scheme and artifice, and to misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of the scheme and artifice and the acts committed in furtherance thereof.

D. The Wire Transmissions:

Beginning on or about January 2015, and continuing through February 2022, all dates approximate and inclusive, in the District of South Dakota and elsewhere, the Defendant, having devised the above-described scheme and artifice to defraud, did knowingly use and cause communications to be transmitted in interstate commerce, by means of electronic wire communications, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice to defraud.

On or about the dates listed below, the Defendant caused, among others, the following wire communications to be sent, with each such transmission constituting a separate count:

<b>Count</b>	<b>Date of Wire Transmission</b>	<b>Type of Wire Transmission</b>	<b>Description of Interstate Wire Transmission</b>
1	October 28, 2020	Check #42116 in the amount of \$11,215.24	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
2	November 30, 2020	Check #42200 in the amount of \$1,034.44	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
3	November 30, 2020	Check #42201 in the amount of \$15,910.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
4	December 28, 2020	Check #42286 in the amount of \$8,260.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
5	March 18, 2021	Check #42546 in the amount of \$19,425.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
6	April 29, 2021	Check #42573 in the amount of \$15,250.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
7	April 1, 2021	Check #42583 in the amount of \$10,505.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.

<b>Count</b>	<b>Date of Wire Transmission</b>	<b>Type of Wire Transmission</b>	<b>Description of Interstate Wire Transmission</b>
8	June 9, 2021	Check #42780 in the amount of \$12,420.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
9	July 29, 2021	Check #43005 in the amount of \$12,684.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
10	August 30, 2021	Check #43100 in the amount of \$16,069.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
11	June 29, 2021	Check #6459 in the amount of \$13,348.00	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
12	November 1, 2021	Check #6651 in the amount of \$16,445.20	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.
13	November 29, 2021	Check #6694 in the amount of \$10,544.20	From First Bank & Trust in South Dakota to Plains Commerce Bank in South Dakota through Minnesota.

Defendant's actions were all in violation of 18 U.S.C. § 1343.

A TRUE BILL:

**NAME REDACTED**

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Foreperson

ALISON J. RAMSDELL  
United States Attorney

By: 

[5]

Defendant: Reva Plunkett

Penalties:

Each count: 20 years of imprisonment, \$250,000 fine, or both; 3 years supervised release, 2 years upon revocation; \$100 VAF; restitution.

Date Filed: October 4, 2022.