

INDICTMENT
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK

-against-

1. RAYMOND KAYUME

Defendant.

Filed:

INDICTMENT NO. 2738-2025

STATE OF NEW YORK OFFICE
OF THE ATTORNEY GENERAL

PUBLIC INTEGRITY BUREAU

COUNTS

P. L. § 470.05(1)(a)(ii)(A)(b) MONEY LAUNDERING IN
IN THE FOURTH DEGREE

Raymond Kayume (1)

P. L. § 190.65(1)(b) SCHEME TO DEFRAUD
IN THE FIRST DEGREE

Raymond Kayume (2)

P. L. § 175.10 FALSIFYING BUSINESS
RECORDS IN THE FIRST
DEGREE

Raymond Kayume (3-5)

A TRUE BILL

GRAND JURY FOREPERSON

LETITIA JAMES
ATTORNEY GENERAL
STATE OF NEW YORK

COUNT ONE

THE GRAND JURY OF THE COUNTY OF QUEENS, by this Indictment, accuses the defendant, RAYMOND KAYUME, of the crime of MONEY LAUNDERING IN THE FOURTH DEGREE in violation of §470.05(1)(a)(ii)(A)(b) of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about and in between January 14, 2022 and April 18, 2022, in the County of Queens, State of New York and elsewhere in the State of New York, while acting in concert with others, knowing that property involved in or more financial transactions represented the proceeds of criminal conduct, conducted financial transactions which in fact involved the proceeds of specified criminal conduct, specifically, cash payments made to an individual known to this Grand Jury employed at DELTA AIRLINES (the “DELTA EMPLOYEE”), and knowing that the transaction or transactions in whole or in part were designed to conceal or disguise the nature, the location, the source, the ownership or the control of property believed to be the proceeds of the aforementioned criminal conduct and that the total represented value of such property involved in such financial transactions exceeded five thousand dollars.

COUNT TWO

AND THE AFORESAID GRAND JURY, by this Indictment, accuses the defendant, RAYMOND KAYUME, of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE in violation of §190.65(1)(b) of the Penal Law of the State of New York, committed as follows:

Said defendants, on or about and in between January 14, 2022 and April 18, 2022, in the County of Queens, State of New York, while acting in concert with others, engaged in a scheme constituting a systemic ongoing course of conduct with the intent to defraud more than one person

or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property from one or more of such persons with a value in excess of one thousand dollars.

COUNT THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, RAYMOND KAYUME, of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about January 14, 2022, in the County of Queens, State of New York, while acting in concert with others, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely [REDACTED] COMPANY 1, and the defendant's intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, RAYMOND KAYUME, of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about March 3, 2022, in the County of Queens, State of New York, while acting in concert with others, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely [REDACTED] COMPANY 1, and the defendant's intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

COUNT FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, RAYMOND KAYUME, of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE in violation of §175.10 of the Penal Law of the State of New York, committed as follows:

Said defendant, on or about April 18, 2022, in the County of Queens, State of New York, while acting in concert with others, with the intent to defraud, made or caused a false entry in the business records of an enterprise, namely [REDACTED] COMPANY 1, and the defendant's intent to defraud included an intent to commit another crime or to aid or conceal the commission thereof.

LETITIA JAMES
ATTORNEY GENERAL
STATE OF NEW YORK

BY: _____
NICHOLAS KYRIACOU
ASSISTANT ATTORNEY GENERAL