

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
 :  
 v. : Crim. No. 13-  
 :  
 LEO VIGUIE :  
 : 18 U.S.C. §§ 641 and 2

INFORMATION

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

THEFT AND CONVERSION OF GOVERNMENT FUNDS

1. At all times relevant to this Information:

a. Defendant LEO VIGUIE (defendant "VIGUIE"), was the owner of L.V. Renovations, LLC, a general contracting company located in Bayonne, New Jersey. Defendant VIGUIE resided in Bayonne, New Jersey.

b. The City of Bayonne Department of Community Development ("CBD CD") was a government agency that received funds from the United States Department of Housing and Urban Development ("HUD") under a federal program that provided grants to low income families to rehabilitate their homes and to repair conditions that were considered to affect their health and safety, and their homes' accessibility, energy efficiency or code compliance, up to an amount of \$20,000.

2. In or about September 2011, defendant VIGUIE, as the owner of L.V. Renovations, LLC, caused another contractor to provide defendant VIGUIE with a bid that was higher than his own for the purpose of obtaining HUD grant funds from the City of

Bayonne. Defendant VIGUIE then submitted the other contractor's bid along with his own to the CBDCD. As a result of defendant VIGUIE colluding with the other contractor and submitting the two bids, defendant VIGUIE wrongfully obtained \$20,000 in HUD grant funds from the CBDCD in or about September 29, 2011.

3. In or about December 2011, defendant VIGUIE, as the owner of L.V. Renovations, LLC, supplied another contractor with a bid on behalf of L.V. Renovations, LLC, that was higher than the other contractor's bid for the purpose of obtaining HUD grant funds from the City of Bayonne. The other contractor then submitted the two bids to the CBDCD. As a result of defendant VIGUIE colluding with the other contractor who then submitted the two bids, the other contractor wrongfully obtained \$20,000 in HUD grant funds from the CBDCD in or about December 28, 2011.

4. Between in or about September 2011 and in or about December 2011, in the District of New Jersey and elsewhere, defendant

LEO VIGUIE

did knowingly embezzle, steal, purloin, and convert to his own use and the use of another, money of the United States Department of Housing and Urban Development, a department and agency of the United States, that is, \$40,000 in grant funds to which he was not entitled.

In violation of Title 18, United States Code, Section 641 and Section 2.

*Paul J. Fishman/rah*

PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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**United States District Court  
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**UNITED STATES OF AMERICA**

**v.**

**LEO VIGUIE**

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**INFORMATION FOR**

**18 U.S.C. §§ 641 and 2**

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**PAUL J. FISHMAN**

*U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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**ZAHID N. QURAIISHI**

*ASSISTANT U.S. ATTORNEY*

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