

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14 -
v. : 18 U.S.C. § 371
:
RAYMOND NORVILLE

SUPERSEDING INFORMATION

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

At all times relevant to this Information:

1. Defendant RAYMOND NORVILLE (hereinafter "NORVILLE") was owner of RRL Unique Homes, Inc. located in Orange, New Jersey. He held himself out to be a contractor who restored commercial and residential buildings.

2. C.P. owned a residential home in the Riverdale section of the Bronx, New York which she intended to upgrade and remodel (hereinafter the "remodeling project").

3. From in or about January, 2011 to in or about November 15, 2011, in the District of New Jersey and elsewhere, defendant

RAYMOND NORVILLE

knowingly and intentionally conspired and agreed with another, to commit an offense against the United States; namely, a scheme and artifice to defraud C.P., and to obtain money and property

from C.P., namely approximately \$98,600 in U.S. currency, by means of materially false and fraudulent pretenses, representations, and promises, and to do so by means of wire communications in interstate commerce, through certain writings, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

Scheme to Defraud

4. It was a part of the scheme to defraud that, in or about January 2011, defendant RAYMOND NORVILLE agreed to perform extensive remodeling on the Bronx residence of the C.P. for approximately \$250,000;

5. It was further part of the scheme to defraud that, in from February 2011 to May 2011, defendant RAYMOND NORVILLE submitted to C.P. a series of invoices inducing her to pay him approximately \$98,600 in U.S. currency for the purchase of materials, architectural plans, rental equipment and permits for the remodeling project at her residence;

6. It was further part of the scheme to defraud that, during the spring of 2011, defendant RAYMOND NORVILLE repeatedly telephoned C.P. in Florida seeking funds in support of the remodeling project;

7. It was further part of the scheme to defraud that the defendant RAYMOND NORVILLE failed to commence the remodeling project or surrender building materials purportedly purchased

with the funds provided by C.P.;

8. It was further part of the scheme to defraud that, once the remodeling project was abandon by the defendant, he made repeated false and misleading statements to C.P. promising the return of the \$98,600.

OVERT ACT

9. In furtherance of the conspiracy and to effect its unlawful object, defendant RAYMOND NORVILLE committed and caused to be committed the following overt act, among others, in the District of New Jersey and elsewhere:

a. On or about June 9, 2011, the defendant RAYMOND NORVILLE, under the guise of repaying a portion of the \$98,600, presented C.P. with a check in the amount of \$24,500 which "bounced" due to insufficient funds.

All in violation of Title 18, United States Code, Section 371.

United States Attorney
Paul J. Fishman