

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 15-
v. :
: 18 U.S.C. § 641 and § 2
LEOVALDO FUNDORA :
: I N F O R M A T I O N

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

1. At all times relevant to this Information:
 - a. Defendant LEOVALDO FUNDORA owned Falcon Remodeling Inc. ("Falcon"), a general contracting company located in the City of Guttenberg, New Jersey.
 - b. There was an individual who was an Inspector ("Inspector 1") at the City of Union City Community Development Agency ("UCCDA").
 - c. There was another individual who was an Inspector at the UCCDA ("Inspector 2").
 - d. There was an individual who owned a paving contracting company located in Weehawken, New Jersey ("Contractor 1").
 - e. There was an individual who owned a construction company in Jersey City, New Jersey ("Contractor 2").
 - f. The UCCDA was a government agency that received funds from the United States Department of Housing and Urban Development ("HUD") under a federal block grant that provided funding for, among other things, home improvement projects and sidewalk replacement projects.

2. Between in or about May 2007 and in or about September 2011, defendant LEOVALDO FUNDORA, as the owner of Falcon, and at the direction of Inspector 1 and Inspector 2, colluded with Contractor 1 and Contractor 2 to provide defendant LEOVALDO FUNDORA with numerous proposals from Contractor 1's and Contractor 2's companies that were higher than Falcon's proposals. Defendant LEOVALDO FUNDORA then submitted Contractor 1's company's proposals, Contractor 2's company's proposals, and Falcon's proposals to the UCCDA in order to improperly obtain home improvement projects and sidewalk replacement projects, and ultimately, HUD grant funds from the UCCDA for Falcon for the completion of those projects.

3. Defendant LEOVALDO FUNDORA's conduct caused a loss of more than \$120,000, but not more than \$200,000.

4. Between in or about May 2007 and in or about September 2011, in the District of New Jersey and elsewhere, defendant

LEOVALDO FUNDORA

did knowingly embezzle, steal, purloin, and convert to his own use and the use of another, money of HUD, a department and agency of the United States, 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