

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 16-
	:	
JONEL NORMIL	:	18 U.S.C. § 371
	:	18 U.S.C. § 981(a)(1)(C)
	:	28 U.S.C. § 2461(c)

INFORMATION

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

Introduction

1. At all times relevant to this Information:
 - a. Defendant JONEL NORMIL resided in Little Egg Harbor, New Jersey and was employed as a letter carrier with the United States Postal Service ("USPS") in Cape May Court House, New Jersey.
 - b. There was a post office located in Stone Harbor, New Jersey (the "Stone Harbor Post Office") that did not employ any letter carriers. NORMIL and other letter carriers assigned to the Cape May Court House post office picked up and dropped off mail, on a daily basis, at the Stone Harbor Post Office.

The Conspiracy

2. From in or about February 2015 to in or about July 2015, in Cape May County, in the District of New Jersey, and elsewhere, defendant

JONEL NORMIL

did knowingly and intentionally conspire and agree with others to commit an

offense against the United States, that is, to embezzle, steal, and convert to his own use and to the use of others blank money order forms provided by and under the authority of the USPS, contrary to Title 18, United States Code, Section 500.

Object of the Conspiracy

3. The object of the conspiracy was to obtain money by stealing blank USPS money orders, imprinting them in the amounts of \$900 or \$1,000, and thereafter depositing and cashing these money orders at banks and post offices.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. Defendant JONEL NORMIL used his position as a letter carrier to access and steal blank postal money orders from the Stone Harbor Post Office.

b. Defendant JONEL NORMIL transferred the stolen blank money orders to a co-conspirator.

c. The money orders were subsequently made to appear legitimate and were imprinted with dollar values of \$900 or \$1,000.

d. Co-conspirators deposited the money orders into bank accounts and withdrew the cash from the bank accounts before the banks detected such illegal activity.

e. Co-conspirators also cashed the money orders at post offices in New Jersey, New York, Connecticut, and Georgia.

Overt Acts

5. In furtherance of the conspiracy and in order to effect the object thereof, defendant JONEL NORMIL and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. On or about May 28, 2015, in Stone Harbor, New Jersey, defendant JONEL NORMIL stole approximately 20 blank postal money orders from the Stone Harbor Post Office.

b. On or about July 24, 2015, four money orders stolen by defendant JONEL NORMIL were deposited into a Bank of America account, each in the amount of \$1,000.

In violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant JONEL NORMIL, that upon conviction of the offense charged in this Information, the government will seek forfeiture in the amount of \$181,100 in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds traceable to such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c),

to seek forfeiture of any other property of defendant JONEL NORMIL up to the value of the forfeitable property described in paragraph 2.

Paul J. Fishman/rah

PAUL J. FISHMAN
United States Attorney

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