

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
RANALDO BENNETT	:	18 U.S.C. § 1349

INFORMATION

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

(Conspiracy to Commit Wire Fraud)

Background

1. At all times relevant to this Information:
 - a. “Victim Organization” was a condominium association that owned a multi-building, multi-level condominium complex (the “Facility”) in Jersey City, New Jersey.
 - b. “Company-1” was a property management company responsible for managing the day-to-day operations of the Facility, including maintenance and repair work on the external and internal common areas and condominiums. As part of its responsibilities, Company-1 oversaw the selection and oversight of third-party vendors who provided construction services at the Facility.
 - c. Defendant Rinaldo Bennett (“BENNETT”) resided in Jersey City, New Jersey, and was employed by Company-1 as the Facility’s lead onsite property manager. His responsibilities included supervising Co-conspirator-1, identifying vendors to perform construction services at the Facility, overseeing and managing

the work, and collecting and approving invoices to Victim Organization from vendors who performed the work. BENNETT worked closely with Co-conspirator-1 to, among other things, select, oversee, and manage vendor maintenance and repair work at the Facility.

d. “Co-conspirator-1” resided in Montclair, New Jersey, and was a Facility superintendent responsible for handling and overseeing maintenance and repair projects.

e. “Co-conspirator-2” resided in Frenchtown and Jersey City, New Jersey, and owned a painting and maintenance company (“CC-Company”) located in Union City, New Jersey. CC-Company received and performed maintenance and repair work at the Facility.

The Conspiracy

2. From in or around November 2018 through in or around October 2020, in the District of New Jersey and elsewhere, the defendant,

RANALDO BENNETT,

knowingly and intentionally conspired and agreed with Co-conspirator-1 and Co-conspirator-2 to devise a scheme and artifice to defraud and to deprive Victim Organization of money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Goal of the Conspiracy

3. The goal of the conspiracy was for BENNETT and his co-conspirators to enrich themselves by fraudulently causing Victim Organization to pay inflated prices for Co-conspirator-2's work at the Facility, and for Co-conspirator-2 to pay BENNETT and Co-conspirator-1 kickbacks in exchange for them steering work to Co-conspirator-2 and his company, CC-Company.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. From in or around November 2018 through in or around October 2020, on behalf of Victim Organization, BENNETT and Co-conspirator-1 steered over \$500,000 in maintenance and construction work at the Facility to Co-conspirator-2 and CC-Company.

b. BENNETT, with the aid of Co-conspirator-1, falsified invoices from Co-conspirator-2 and CC-Company to Victim Organization, which caused Victim Organization to unknowingly pay substantially inflated prices for that work.

c. In exchange for steering work to Co-conspirator-2 and CC-Company, BENNETT and Co-conspirator-1 requested and received kickbacks from Co-conspirator-2, which Co-conspirator-2 paid from Victim Organization's overpayments to Co-conspirator-2 and CC-Company.

d. Co-conspirator-2 paid kickbacks to BENNETT in checks and cash, and to Co-conspirator-1 in cash drawn from CC-Company's bank account in

New Jersey. BENNETT deposited the checks paid to him into his personal bank account at branches in Delaware and New York.

e. As part of the conspiracy, Co-conspirator-2 provided most of BENNETT's kickbacks to Co-conspirator-1 who then delivered the checks and cash to BENNETT.

f. In total, based on the fraudulently inflated invoices, Victim Company paid CC-Company and Co-conspirator-2 approximately \$1,006,952 for work that was actually valued at approximately \$500,000. In turn, Co-conspirator-2 used those overpayments to pay over \$460,000 in kickbacks to BENNETT and approximately \$30,000 in cash kickbacks to Co-conspirator-1. For example:

i. On or about August 29, 2020, Co-conspirator-2 provided BENNETT with two invoices totaling approximately \$13,500, which reflected the accurate value of work completed at the Facility.

ii. BENNETT subsequently altered those invoices by falsely charging Victim Organization approximately \$25,000 for that same work.

iii. On or about September 3, 2020, based on the fraudulently inflated invoices, Victim Organization paid CC-Company approximately \$25,000.

iv. On or about September 8, 2020, at BENNETT's request, Co-conspirator-2 paid BENNETT, through Co-conspirator-1, a kickback of approximately \$11,500 by check, which BENNETT deposited into his personal bank account. The check was processed via interstate wire between Delaware and New Jersey.

v. At Co-conspirator-1's request, on or about September 8, 2020, Co-conspirator-2 paid Conspirator-1 a kickback of approximately \$200 in cash.

g. The conspiracy resulted in actual losses to Victim Organization in excess of \$470,000.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

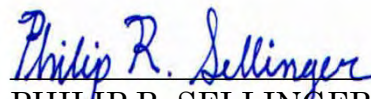
1. Upon conviction of the offense charged in the Information, defendant RANALDO BENNETT shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that the defendant obtained that constitutes or is derived from proceeds traceable to the commission of such offense, and all property traceable to such property.

Substitute Assets Provision

2. If any of the property described above, 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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described in paragraph 1.


PHILIP R. SELLINGER
United States Attorney