
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
LINDA CAROL ROACH : Mag. No. 07-7065

I, Damian Salvati, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

From in or about January 2004 to in or about September 2006, in Middlesex County, in the District of New Jersey and elsewhere, defendant

LINDA CAROL ROACH

did knowingly and willfully obstruct, delay, and affect interstate commerce by extortion under color of official right, by soliciting and accepting corrupt payments that were paid by others, with their consent, in violation of Title 18, United States Code, Section 1951(a) and 2.

I further state that I am a Special Agent with the United States Department of Housing and Urban Development, Office of Inspector General, and that this Complaint is based on the following facts:

SEE ATTACHMENT A

Continued on the attached pages and made a part hereof.

DAMIAN SALVATI, Special Agent
U.S. Department of Housing and Urban Development,
Office of Inspector General

Sworn to before me and subscribed in my presence,

May 23, 2007, at Newark, New Jersey

HONORABLE ESTHER SALAS
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Damian Salvati, a Special Agent of the United States Department of Housing and Urban Development, Office of Inspector General ("HUD-OIG"), having conducted an investigation, having spoken with other law enforcement agents, and having reviewed reports, and other documents, am aware of the following facts:

1. At all times relevant to this Complaint, the City of New Brunswick's Department of Community, Planning, and Economic Development ("the Department") administered housing rehabilitation assistance programs designed to remedy substandard conditions in homes owned by qualifying low or moderate income owners within the City of New Brunswick. The Department received federal funding to operate these programs from the United States Department of Housing and Urban Development ("HUD") by way of interstate wire transfers.

2. At all times relevant to this Complaint, defendant LINDA CAROL ROACH was employed as a Supervisory Clerk Typist ("Supervisory Clerk") for the Department. As a Supervisory Clerk, defendant ROACH performed the role of an office manager and was responsible for, among other things, processing purchase orders that were necessary for securing payments to contractors for rehabilitation work that they performed.

3. At all times relevant to this Complaint, two co-conspirators of defendant ROACH ("CC-1" and "CC-2") were co-owners of F.M., a construction and maintenance business based in New Brunswick, New Jersey. From in or about January 2004 to in or about September 2006, the Department awarded F.M. in excess of approximately \$1.3 million in contracts for the rehabilitation of homes located in New Brunswick, New Jersey. F.M. employed and paid at least one individual, who resided in New York and traveled to New Jersey to perform the rehabilitation work at issue.

4. CC-1 and CC-2 have admitted to participating in a scheme with multiple employees of the Department, wherein the employees accepted corrupt cash payments and other benefits from CC-1 and CC-2 in exchange for exercising their official influence in favor of CC-1's and CC-2's company, F.M. With regard to defendant LINDA CAROL ROACH, CC-1 and CC-2 have indicated that they entered into a corrupt agreement with defendant ROACH beginning in or around 2004. As part of this corrupt agreement, from in or about January 2004 to in or about September 2006, CC-1 and CC-2 admitted to making monthly cash payments of approximately \$100-\$150 to defendant ROACH in exchange for defendant ROACH using her position and influence as Supervisory Clerk to expedite the payment of Department checks to CC-1's and

CC-2's company, F.M.

5. CC-1's and CC-2's statements regarding their participation in a corrupt payoff scheme with defendant LINDA CAROL ROACH have been corroborated. Banking records confirm the cashing of F.M. checks earmarked for defendant ROACH and other employees of the Department. Records obtained from the City of New Brunswick further reflect that defendant ROACH timely processed paperwork necessary for securing rehabilitation payments to F.M.

6. At all times relevant to this Complaint, two other co-conspirators of defendant LINDA CAROL ROACH ("CC-3" and "CC-4") were a co-owner and manager of T.M., respectively. T.M. was a construction and maintenance business based in Perth Amboy, New Jersey. From in or about June 2004 to in or about September 2006, the Department awarded T.M. in excess of approximately \$900,000 in contracts for the rehabilitation of homes located in New Brunswick, New Jersey. T.M. employed and paid at least one individual, who resided in New York and traveled to New Jersey to perform the rehabilitation work at issue in New Brunswick.

7. CC-3 and CC-4 have admitted to participating in a scheme with multiple employees of the Department, wherein the employees accepted corrupt cash payments and other benefits from CC-3 and CC-4 in exchange for exercising their official influence in favor of CC-3's and CC-4's company, T.M. With regard to defendant LINDA CAROL ROACH, CC-3 and CC-4 have indicated that they entered into a corrupt agreement with defendant ROACH beginning in or about June 2004. As part of this corrupt agreement, from in or about June 2004 to in or about September 2006, CC-3 and CC-4 admitted to making regular cash payments of approximately \$100 to defendant ROACH in exchange for defendant ROACH using her position and influence as Supervisory Clerk to expedite the payment of Department checks to CC-3's and CC-4's company, T.M.

8. CC-3's and CC-4's statements regarding their participation in a corrupt payoff scheme with defendant ROACH also have been corroborated. Review of a business ledger kept by T.M. shows the approximate amount and approximate date of each cash payment to defendant ROACH. The ledger reflects that defendant ROACH accepted from T.M. approximately \$600 in or about 2004, approximately \$1,410 in or about 2005, and approximately \$800 in or about 2006. In total, defendant LINDA CAROL ROACH accepted from CC-3 and CC-4 approximately \$2,810 in corrupt cash payments for exercising and agreeing to exercise her influence as Supervisory Clerk in accelerating the payment of rehabilitation

contract moneys to T.M. Records obtained from the City of New Brunswick reflect that defendant ROACH timely processed paperwork necessary for securing rehabilitation payments to T.M.

9. On or about October 25, 2006, in an interview with law enforcement agents, defendant LINDA CAROL ROACH admitted to accepting corrupt cash payments from CC-1, CC-2, and CC-3 in exchange for processing Department paperwork relating to payment to F.M. and T.M. in a timely manner. Defendant ROACH stated, in substance and in part, that she would typically accept the cash payments at various, agreed-upon locations outside the Department. On or about November 2, 2006, in a subsequent interview with law enforcement agents in which she further discussed her corrupt arrangements with contractors, defendant ROACH stated, in substance and in part, that she thought it was a "blessing," but that she knew her conduct was "illegal."