

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	
LEE HOLLAND	:	Mag. No. 07-7043

Signature of Judicial Officer

ATTACHMENT A

I, Thomas J. Coyle, a Special Agent with the Federal Bureau of Investigation (“FBI”), am aware of the following facts as a result of my investigation and after having spoken with other law enforcement officials:

1. At all times relevant to this Complaint, defendant LEE HOLLAND was employed as a building inspector by the Housing Authority of the City of Paterson (the “Housing Authority”), Section 8 department, in Paterson, New Jersey. As a building inspector, the duties of defendant HOLLAND included the inspection of rental apartments leased or to be leased by individuals receiving Section 8 housing benefits, the issuance of violation orders providing notice of housing code violations at such properties, and, if necessary, the initiation of legal action against those landlords who failed to take prompt corrective action in response to a violation order.

2. At all times relevant to this Complaint, a cooperating witness, “C.W.,” was an individual who was known in Paterson to be engaged in the real estate business. Specifically, C.W. was known to be an individual who helped buyers to purchase various residential properties in Paterson. C.W. then “managed” these properties for the buyers by renting them to recipients of Section 8 housing benefits. CW retained the rent payments for the properties, which exceeded \$5,000 per year.

3. From in or about January 2006 to in or about March 2006, defendant LEE HOLLAND solicited and accepted corrupt payments from C.W. in exchange for the performance of his official duties as a Section 8 building inspector. Defendant HOLLAND accepted cash and other payments from C.W. for, among other things, providing favorable inspections of C.W.’s properties and assisting C.W. in resolving legal actions initiated by the Housing Authority as a result of tenant complaints regarding housing code violations.

4. On or about January 16, 2006, defendant LEE HOLLAND met with C.W. in Paterson, New Jersey. This meeting was consensually monitored and recorded by the FBI and the U.S. Department of Housing and Urban Development, Office of the Inspector General (“HUD OIG”). At the meeting, defendant HOLLAND and C.W. agreed that C.W. would pay defendant HOLLAND \$200 per week in exchange for defendant HOLLAND’s continued assistance to C.W. in defendant HOLLAND’s official capacity.

5. On or about January 27, 2006, defendant LEE HOLLAND met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant HOLLAND solicited and accepted a payment of \$200 from C.W.

6. On or about February 15, 2006, defendant LEE HOLLAND met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant HOLLAND solicited and accepted a payment of \$400 from C.W. and agreed to contact C.W. if he learned of any problems with C.W.'s apartments.

7. On or about March 24, 2006, defendant LEE HOLLAND met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, C.W. and defendant HOLLAND discussed certain properties for which C.W. indicated C.W. needed "re-rental" certificates, which are required before a Section 8 property can be rented to a new Section 8 tenant. C.W. solicited defendant HOLLAND's assistance with obtaining these certificates of approval.

8. During the one-year period relevant to this Complaint, the City of Paterson Housing Authority received in excess of \$10,000 in federal funding.