

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	
	:	
MARK HOOKS	:	Mag. No. 07-7044

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 MARK HOOKS was employed as a building inspector by the City of Passaic in Passaic, New Jersey. As a building inspector, the duties of defendant MARK HOOKS included the inspection of rental apartments, 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 Passaic to be engaged in the real estate business. Specifically, C.W. was known to be an individual who helped buyers inside and outside New Jersey to purchase various residential properties in Passaic as "investments" for the buyers. In order to purchase the properties, C.W. and others helped the buyers to apply for mortgage loans from mortgage lenders located both inside and outside New Jersey. C.W. then "managed" these properties for the buyers by renting them to tenants.

3. From in or about January 2006 to in or about February 2006, defendant MARK HOOKS solicited and accepted corrupt payments from C.W. in exchange for the performance of his official duties as a City of Passaic building inspector. Defendant HOOKS 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 City of Passaic as a result of tenant complaints regarding housing code violations.

4. On or about January 27, 2006, defendant MARK HOOKS met with C.W. in Passaic, 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 HOOKS stated to C.W., in substance and in part, that C.W. owed him "five" for past services rendered. Defendant HOOKS then accepted a cash payment of \$500 from C.W. When C.W. inquired about a pending legal action regarding a property on Jackson Street in Passaic (the "Jackson Street Property"), defendant HOOKS informed C.W., in substance and in part, that there was an outstanding bench warrant in the amount of \$3,400 and that nothing could be done about the case unless that amount was posted. Defendant HOOKS told C.W., in substance and in part, that he hoped they could do more "business" together.

5. On or about February 24, 2006, defendant MARK HOOKS met with C.W. in Passaic. This meeting was consensually monitored and recorded by the FBI and HUD

OIG. At the meeting, defendant HOOKS informed C.W. that he had “good news,” specifically, that the “paperwork” on the Jackson Street Property had been “lost.” Defendant HOOKS further solicited a loan from C.W. of “a couple hundred dollars.” When C.W. informed defendant HOOKS that C.W. did not have that amount of money, defendant HOOKS demanded that C.W. provide him with \$300 the following Monday.