
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. :
 :
 VICTOR ORTIZ and :
 STANDLEY WILLIAMS : Mag. No. 07-7046
 :

I, Thomas J. Coyle, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

From in or about January 2006 to in or about May 2006, in Passaic County, in the District of New Jersey and elsewhere, defendants

VICTOR ORTIZ and
STANDLEY WILLIAMS

did knowingly and willfully conspire with each other and others to obstruct, delay and affect interstate commerce by extortion under color of official right, by obtaining corrupt payments that were paid by another, with that person's consent.

In violation of Title 18, United States Code, Section 1951(a).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Thomas J. Coyle, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
March 23, 2007, at Newark, New Jersey

HONORABLE ESTHER SALAS
UNITED STATES MAGISTRATE JUDGE

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 VICTOR ORTIZ was employed as a building inspector by the Housing Authority of the City of Paterson (the “Housing Authority”), Section 8 department, and defendant STANDLEY WILLIAMS was employed as a building inspector by the City of Paterson Department of Community Development, both in Paterson, New Jersey. As building inspectors, the duties of defendants ORTIZ and WILLIAMS 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 Paterson 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 Paterson 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 recipients of Section 8 housing benefits.

3. From in or about January 2006 to in or about May 2006, defendants VICTOR ORTIZ and STANDLEY WILLIAMS conspired with each other and others to solicit and accept corrupt payments from C.W. in exchange for acts performed in their official capacities as Housing Authority and Department of Community Development building inspectors. Defendants ORTIZ and WILLIAMS accepted cash payments from C.W. for, among other things, agreeing not to issue violation orders to C.W. and to obtain dismissals of legal actions already pending against C.W. in City of Paterson Municipal Court.

4. On or about February 3, 2006, defendants VICTOR ORTIZ and STANDLEY WILLIAMS 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 WILLIAMS stated to C.W., in substance and in part, that he and defendant ORTIZ could “work with” C.W. if C.W. contacted them when a tenant complaint first came in. C.W. asked whether defendants ORTIZ and WILLIAMS could make the tenant complaint “disappear,” and defendant ORTIZ responded, in substance and in part, “Exactly.” Defendant ORTIZ further stated, in substance and in part, that C.W. would

not have to make extensive repairs in such an instance but rather could merely apply “a slap of paint” over the problem. During the meeting, defendants ORTIZ and WILLIAMS accepted \$2,000 in cash from C.W., which they divided between them in C.W.’s presence.

5. On or about February 24, 2006, defendants VICTOR ORTIZ and STANDLEY WILLIAMS met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant ORTIZ stated to C.W., in substance and in part, that C.W. “owed [defendant ORTIZ] a lot.” Defendants ORTIZ and WILLIAMS proceeded to discuss with C.W. various properties, some of which C.W. informed them C.W. did not own or manage. After learning that they were not C.W.’s, defendants ORTIZ and WILLIAMS indicated that they would proceed with legal action regarding those properties. Regarding one such property, defendant ORTIZ explained to C.W., in substance and in part, that defendant WILLIAMS “did not want to get in court against you.”

6. On or about February 27, 2006, defendants VICTOR ORTIZ and STANDLEY WILLIAMS met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendants ORTIZ and WILLIAMS accepted \$2,000 in cash from C.W., which they divided between them in C.W.’s presence. Defendant WILLIAMS stated to C.W., in substance and in part, that he would be willing to assist C.W. with obtaining the certificates of re-rental approval required by City of Paterson ordinance before re-renting a property to a new tenant.

7. On or about March 1, 2006, defendant VICTOR ORTIZ met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant ORTIZ reviewed with C.W. a list of notices that C.W. had received from the City of Paterson Municipal Court. Regarding one such notice, defendant ORTIZ indicated to C.W., in substance and in part, “I’m going to get Stan to work on this one.” Regarding another, defendant ORTIZ indicated, in substance and in part, “I’m going to work hard on this one.”

8. On or about March 24, 2006, defendants VICTOR ORTIZ and STANDLEY WILLIAMS met with C.W. in Paterson. At the meeting, which was electronically monitored and recorded by the FBI and HUD OIG, defendant WILLIAMS first entered CW's car alone. Defendant WILLIAMS stated to C.W., in substance and in part, that he had been able to get a particular tenant complaint dismissed, but that a new tenant in that property was complaining again. Defendant WILLIAMS indicated to C.W. that C.W. should request an extension in which to respond to the new complaint. Defendant ORTIZ subsequently entered the car and accepted \$1,500 in cash from C.W., which he divided with defendant WILLIAMS in C.W.’s presence.