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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA                   :           **CRIMINAL COMPLAINT**  
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BENNY RAMOS                                   :           Mag. No. 07-7047

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 2004 to in or about February 2006, in Passaic County, in the District of New Jersey and elsewhere, defendant

BENNY RAMOS

did knowingly, willfully and corruptly solicit and demand and accept and agree to accept things of value, namely, cash payments, with the intent to be influenced and rewarded in connection with a business, transaction, or series of transactions of a local government or agency involving a thing of value of \$5,000 or more, where the government or agency received in a one-year period in excess of \$10,000 in federal funds.

In violation of Title 18, United States Code, Sections 666(a)(1)(B) and 2.

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.

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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  
UNITED STATES MAGISTRATE JUDGE

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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 BENNY RAMOS was employed by the Housing Authority of the City of Paterson in Paterson, New Jersey (the “Housing Authority”) as the Deputy Director of the Housing Authority’s Section 8 program. As Section 8 Deputy Director, defendant RAMOS was responsible for overseeing the approval of properties and tenants for the receipt of Section 8 benefits and the receipt of such benefits from the U.S. Office of Housing and Urban Development (“HUD”).

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 2004 to in or about February 2006, defendant BENNY RAMOS solicited and accepted corrupt payments from C.W. in exchange for the performance of his official duties as a Housing Authority employee. Defendant RAMOS accepted cash and other payments from C.W. totaling at least approximately \$5,000 for, among other things, helping C.W. to obtain prompt and trouble-free building inspections and steering Section 8-eligible tenants to C.W.’s properties.

4. On or about January 18, 2006, defendant BENNY RAMOS met with C.W. in Paterson, New Jersey. This meeting was consensually monitored and recorded by the FBI and HUD’s Office of the Inspector General (“HUD OIG”). C.W. asked defendant RAMOS, “What do I owe you?” Defendant RAMOS responded, in substance and in part, that C.W. owed defendant RAMOS payments for both December 2005 and January 2006. C.W. asked defendant RAMOS how much money he wanted from C.W., and defendant RAMOS answered, “You normally give me \$1,000 a month.”

5. On or about January 27, 2006, defendant BENNY RAMOS met with C.W. in Paterson, New Jersey. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant RAMOS accepted \$2,000 in cash from C.W. C.W. indicated to defendant RAMOS that C.W. intended to pay him another \$2,000 for the months of January and February 2006.

6. On or about February 3, 2006, defendant BENNY RAMOS met with C.W. in Paterson, New Jersey. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant RAMOS provided C.W. with information about two Housing Authority building inspectors who would be performing inspections, and suggested to C.W. that if C.W. needed more time in which to complete required work, C.W. should apply for an extension.

7. On or about January 19, 2007, I, along with other agents of the FBI and HUD OIG, approached defendant BENNY RAMOS at his residence in Clifton, New Jersey. Defendant RAMOS was informed that he was not under arrest. Defendant RAMOS agreed to speak with the agents voluntarily and admitted, in substance and in part, that he has for over ten years accepted cash bribes in return for the performance of his official duties for the City of Paterson and the Housing Authority. Defendant RAMOS estimated that, in total, he has accepted a total of approximately \$85,000 to \$100,000 in this manner. Defendant RAMOS further admitted, in substance and in part, that he began accepting cash bribes from C.W. in approximately 2004 and that he continued to do so through approximately February 2006.

8. During each of the years relevant to this Complaint, the City of Paterson Housing Authority received in excess of \$10,000 in federal funding.