
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. :
 :
 YOLANDA LANE : Mag. No. 07-7050

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, defendant

YOLANDA LANE

did knowingly and willfully attempt to obstruct, delay and affect interstate commerce by extortion under color of official right, by obtaining corrupt payments that were paid by another, with his consent.

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

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 YOLANDA LANE was employed as a lead paint inspector by the City of Paterson Environmental Health Department in Paterson, New Jersey. As a lead paint inspector, the duties of defendant LANE included the inspection of residential properties offered for lease to determine the presence of lead paint and the issuance of required certificates of inspection.

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, defendant YOLANDA LANE solicited and accepted corrupt payments from C.W. in exchange for the performance of her official duties as a lead paint inspector. Defendant LANE accepted cash and other payments from C.W. for, among other things, providing prompt inspections of C.W.’s properties so that C.W. could quickly obtain the necessary approvals to lease C.W.’s apartments to residential tenants.

4. On or about January 18, 2006, defendant YOLANDA LANE 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 LANE solicited and demanded from C.W. a per apartment fee of \$150 in exchange for performing lead paint inspections of C.W.’s properties. Defendant LANE further discussed with C.W. the need to avoid detection of their arrangement.

5. On or about January 25, 2006, defendant YOLANDA LANE met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant LANE accepted a cash payment of \$300 from C.W., representing her fees for inspecting two of C.W.’s apartments.

6. On or about February 3, 2006, C.W. met with defendant YOLANDA LANE in Paterson. This meeting was consensually monitored and recorded by the FBI

and HUD OIG. At the meeting, C.W. informed defendant LANE, in substance and in part, that C.W. was about to come into possession of some old houses that were likely to contain lead paint, and asked if defendant LANE could work it out so that C.W. could lease the properties first and fix the lead problems later on. Defendant LANE indicated that it was possible but that she would have to see the properties first.

7. On or about May 2, 2006, defendant YOLANDA LANE met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG, and was held at a HUD-owned property that C.W. represented to defendant LANE was one of the properties that C.W. sought to lease to tenants. C.W. and defendant LANE discussed whether LANE would be willing to state that there was no lead in the house when there was, in fact, lead present. Defendant LANE stated, in substance and in part, "If I could help you, I would," but informed C.W. that she had to be careful because another inspector in her department was currently under scrutiny.