

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:

INDICTMENT

UNITED STATES OF AMERICA :

S3 12 Cr. 569 (GBD)

-v.- :

NOVELETTE CAMPBELL, :

a/k/a "Pat Campbell," :

:

Defendant. :

- - - - - x

COUNT ONE

(Conspiracy to Accept Bribes in
Connection with Federal Programs Funds)

The Grand Jury charges:

1. From at least in or about April 2000 through in or about October 2011, in the Southern District of New York and elsewhere, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, namely, to violate Title 18, United States Code, Section 666.

2. It was a part and an object of the conspiracy that NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, and others known and unknown, including agents of an organization, and of a State

and local government and an agency thereof, which organization, government and agency received, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, would and did corruptly solicit and demand for the benefit of a person, and did accept and agree to accept, a thing of value from a person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization, government, and agency involving a thing of value of \$5,000 and more.

Overt Acts

3. In furtherance of said conspiracy and to effect the unlawful object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about April 2009, in Manhattan, New York, a co-conspirator solicited and accepted a cash payment in the amount of \$2,000 from a prospective tenant ("Tenant 1") to allow Tenant 1 to skip the waiting list for a federally subsidized housing development called East River Houses, formerly known as "Tricham Houses."

b. In connection with Tenant 1, CAMPBELL provided an application to Tenant 1, along with the keys to a federally

subsidized housing apartment, knowing that Tenant 1 was not on the waiting list.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Accepting Bribes in Connection with Federal Program Funds)

The Grand Jury further charges:

4. From at least in or about April 2000 through in or about October 2011, in the Southern District of New York and elsewhere, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, being an agent of an organization, and of a State and local government and any agency thereof, which organization, government and agency received, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, to wit, the management company for Tricham Houses in Manhattan, did corruptly solicit and demand for the benefit of a person, and did accept and agree to accept, a thing of value from a person, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of such organization, government, and agency involving a thing of value of \$5,000 and more, to wit, CAMPBELL accepted cash payments and other items in exchange

for providing preferential treatment to individuals seeking federally subsidized housing.

(Title 18, United States Code, Section 666(a)(1)(B).)

COUNT THREE
(False Statements)

The Grand Jury further charges:

5. On or about December 9, 2009, in the Southern District of New York, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully did falsify, conceal, and cover up by trick, scheme, and device material facts, and did make materially false, fictitious, and fraudulent statements and representations, and did make and use a false writing and document knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, to wit, CAMPBELL submitted or caused to be submitted a certification of eligibility to the United States Department of Housing and Urban Development ("HUD") purporting to be signed by the tenant of record, for the purpose of certifying the tenant's eligibility to occupy a federally subsidized apartment, which was also signed by CAMPBELL purporting to verify the same, when in truth and in fact, and as CAMPBELL well knew, the tenant of record never signed the certification.

(Title 18, United States Code, Sections 1001 and 2.)

COUNT FOUR
(False Statements)

The Grand Jury further charges:

6. On or about July 6, 2010, in the Southern District of New York, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, willfully and knowingly did falsify, conceal, and cover up by trick, scheme, and device material facts, and made materially false, fictitious, and fraudulent statements and representations, and made and used a false writing or document knowing the same to contain a materially false, fictitious, and fraudulent statement or entry, to wit, CAMPBELL submitted or caused to be submitted a certification of eligibility to HUD purporting to be signed by the tenant of record, for the purpose of certifying the tenant's eligibility to occupy a federally subsidized apartment, which was also signed by CAMPBELL purporting to verify the same, when in truth and in fact, and as CAMPBELL well knew, the tenant of record never signed the certification.

(Title 18, United States Code, Sections 1001 and 2.)

COUNT FIVE
(False Statements)

The Grand Jury further charges:

7. On or about November 19, 2009, in the Southern District of New York, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the

defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, willfully and knowingly did falsify, conceal, and cover up by trick, scheme, and device material facts, and made materially false, fictitious, and fraudulent statements and representations, and made and used a false writing or document knowing the same to contain a materially false, fictitious, and fraudulent statement or entry, to wit, CAMPBELL submitted or caused to be submitted a certification of eligibility to HUD purporting to be signed by the tenant of record, for the purpose of certifying the tenant's eligibility to occupy a federally subsidized apartment, which was also signed by CAMPBELL purporting to verify the same, when in truth and in fact, and as CAMPBELL well knew, the person who was listed as the tenant of record in the certification never applied for federally subsidized housing.

(Title 18, United States Code, Sections 1001 and 2.)

COUNT SIX
(False Statements)

The Grand Jury further charges:

8. On or about September 15, 2010, in the Southern District of New York, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, willfully and knowingly did falsify, conceal, and cover up by trick, scheme, and device material facts, and made materially false, fictitious, and

fraudulent statements and representations, and made and used a false writing or document knowing the same to contain a materially false, fictitious, and fraudulent statement or entry, to wit, CAMPBELL submitted or caused to be submitted a certification of eligibility to HUD purporting to be signed by the tenant of record, for the purpose of certifying the tenant's eligibility to occupy a federally subsidized apartment, which was also signed by CAMPBELL purporting to verify the same, when in truth and in fact, and as CAMPBELL well knew, the person who was listed as the tenant of record in the certification never applied for federally subsidized housing.

(Title 18, United States Code, Sections 1001 and 2.)

FORFEITURE ALLEGATION
(Counts One and Two)

9. As a result of committing one or more of the bribery offenses alleged in Counts One and Two of this Indictment, NOVELETTE CAMPBELL, a/k/a "Pat Campbell," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real or personal, constituting, derived from, or traceable to proceeds obtained directly or indirectly from the offenses charged in Counts One and Two of this Indictment, including but not limited to over approximately \$70,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offenses.

Substitute Assets Provision

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)


FOREPERSON

Preet Bharara

PREET BHARARA
United States Attorney

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INDICTMENT

S3 12 Cr. 569 (GBD)

18 U.S.C. §§ 371, 566, 1001 & 2.

PREET BHARARA

United States Attorney.

A/TRUE BILL


Foreperson
