

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, defendants MARISOL CORTEZ and FLORA CRUZ were employed by the Housing Authority of the City of Paterson in Paterson, New Jersey (the “Housing Authority”). As employees of the Housing Authority, defendants CORTEZ and CRUZ participated in the administration of the Housing Authority’s Section 8 housing program by helping to identify eligible residential properties for program participants receiving Section 8 housing subsidies.

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 January 2006 to in or about February 2006, defendants MARISOL CORTEZ and FLORA CRUZ agreed with each other and others to solicit and accept corrupt payments from C.W. in exchange for the performance of their official duties as Housing Authority employees. Defendants CORTEZ and CRUZ solicited and accepted cash and other payments from C.W. for, among other things, placing Section 8 participants in rental apartments defendants CORTEZ and CRUZ believed to be owned and/or managed by C.W.

4. On or about January 20, 2006, defendants MARISOL CORTEZ and FLORA CRUZ 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”). During the meeting, defendants CORTEZ and CRUZ expressed concern about being seen with C.W., and requested that C.W. drive to another location. C.W. and defendants CORTEZ and CRUZ discussed payments to be made by C.W. to defendants CORTEZ and CRUZ in exchange for renting C.W.’s apartments to Section 8 recipients. Defendant CORTEZ suggested, in substance and in part, that C.W. pay defendants CORTEZ and CRUZ on a per apartment basis. Defendant CRUZ also requested that C.W. provide her with money for lunch.

5. On or about February 8, 2006, defendant MARISOL CORTEZ met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendant CORTEZ solicited and accepted \$200 in cash from C.W. and requested a list of C.W.’s apartments. Defendant CORTEZ again expressed

concern about being seen with C.W., and requested that at their next meeting, C.W. pick her up on the other side of the street.

6. On or about February 10, 2006, C.W. defendants MARISOL CORTEZ and FLORA CRUZ met with C.W. in Paterson. This meeting was consensually monitored and recorded by the FBI and HUD OIG. At the meeting, defendants CORTEZ and CRUZ solicited and accepted from C.W. \$200 in cash. Defendant CRUZ asked for a list of C.W.'s apartments and stated, in substance and in part, "When we rent it, then you pay us." Defendants CORTEZ and CRUZ discussed with C.W. the need for secrecy and concealment, and defendant CORTEZ stated, in substance and in part, that defendant CRUZ "doesn't want you to say that you are paying us to rent the apartments."

7. During the one-year period relevant to this Complaint, the City of Paterson Housing Authority received in excess of \$10,000 in federal funding.