

codes as well as the national electrical code and the state of Ohio building, plumbing, and elevator codes. CBHD registered building contractors, inspected all new and major rehabilitation construction and provided nuisance abatement to condemned properties. The Department supervised and managed the Code Enforcement, Construction Permitting and Records Administration divisions. The mission was to ensure that all existing and new structures in the City of Cleveland were maintained and constructed in a safe and habitable manner through enforcement of the building and zoning codes, pursuant to the review of plans, issuance of permits and inspection of property.

2. Stonebridge was a commercial and residential development project under construction on the West Bank of the Flats district in Cleveland, Ohio, consisting of luxury condominiums, retail and office space, including restaurants. Stonebridge was valued at approximately \$28 million and was run by K&D Group, Inc., a privately owned development firm.

3. Inspector No. 1, an agent of CBHD, was an electrical inspector responsible for inspecting electrical work on commercial and residential construction projects within the City of Cleveland to ensure compliance with the City of Cleveland's building and zoning codes, including projects such as Stonebridge.

4. Inspector No. 2, an agent of CBHD, was a building inspector responsible for inspecting structural work on commercial and residential construction projects within the City of Cleveland to ensure compliance with the City of Cleveland's building and zoning codes, including projects such as Stonebridge.

5. Defendant, HENRY (“HANK”) J. PICOZZI, was employed by K& D Group, Inc. as Superintendent and Project Manager. In that capacity, PICOZZI was responsible for overseeing job sites, managing day to day operations on job sites, and working with CBHD to ensure compliance with the City of Cleveland’s building and zoning codes.

Stonebridge Bribery Scheme

6. At various times, the Stonebridge project was behind schedule and over budget. PICOZZI bribed Inspector No. 1 and Inspector No. 2 in order to expedite the CBHD approval process, to obtain CBHD approval to reduce construction time and costs, and to expedite approval of occupancy permits for some floors at Stonebridge so that the project could begin to receive income.

The United States Attorney further charges:

COUNT 1
(Bribery in Federally Funded Programs)

7. The General Allegations contained in paragraphs 1 through 6 of this Information are incorporated herein as if set forth in full.

8. On or about March 1, 2007, in the Northern District of Ohio, Eastern Division, the Defendant, HENRY (“HANK”) J. PICOZZI, did corruptly give, offer, and agree to give a thing of value; that is, entertainment and dinner at a strip club, to Inspector No. 2, intending to influence and reward Inspector No. 2 in connection with any business, transaction, and series of transactions of CBHD involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(2).

The United States Attorney further charges:

COUNT 2
(Bribery in Federally Funded Programs)

9. The General Allegations contained in paragraphs 1 through 6 of this Information are incorporated herein as if set forth in full.

10. On or about March 13, 2007, in the Northern District of Ohio, Eastern Division, the Defendant, HENRY ("HANK") J. PICOZZI, did corruptly give, offer, and agree to give a thing of value; that is, entertainment and dinner at a strip club, to Inspector No. 1 and Inspector No. 2, intending to influence and reward Inspector No. 1 and Inspector No. 2 in connection with any business, transaction, and series of transactions of CBHD involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(2).

The United States Attorney further charges:

COUNT 3
(Bribery in Federally Funded Programs)

11. The General Allegations contained in paragraphs 1 through 6 of this Information are incorporated herein as if set forth in full.

12. On or about May 9, 2007, in the Northern District of Ohio, Eastern Division, the Defendant, HENRY ("HANK") J. PICOZZI, did corruptly give, offer, and agree to give a thing of value; that is, \$3000 total in cash, to Inspector No. 1 and Inspector No. 2, intending to

influence and reward Inspector No. 1 and Inspector No. 2 in connection with any business, transaction, and series of transactions of CBHD involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(2).

The United States Attorney further charges:

COUNT 4
(Bribery in Federally Funded Programs)

13. The General Allegations contained in paragraphs 1 through 6 of this Information are incorporated herein as if set forth in full.

14. On or about June 25, 2007, in the Northern District of Ohio, Eastern Division, the Defendant, HENRY ("HANK") J. PICOZZI, did corruptly give, offer, and agree to give a thing of value; that is, \$2000 total in cash, to Inspector No. 1 and Inspector No. 2, intending to influence and reward Inspector No. 1 and Inspector No. 2 in connection with any business, transaction, and series of transactions of CBHD involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(2).

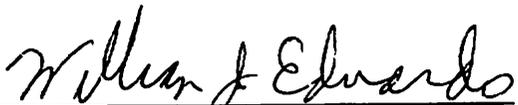
The United States Attorney further charges:

COUNT 5
(Bribery in Federally Funded Programs)

15. The General Allegations contained in paragraphs 1 through 6 of this Information are incorporated herein as if set forth in full.

16. On or about August 16, 2007, in the Northern District of Ohio, Eastern Division, the Defendant, HENRY ("HANK") J. PICOZZI, did corruptly give, offer, and agree to give a thing of value; that is, \$1000 in cash, to Inspector No. 1, intending to influence and reward Inspector No. 1 in connection with any business, transaction, and series of transactions of CBHD involving anything of value of \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a)(2).



WILLIAM J. EDWARDS
UNITED STATES ATTORNEY