

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No. 09-
BILLIE F. THOMAS, : 18 U.S.C. § 1951(a)
a/k/a "Billie Mohamed" : and § 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Defendant and Other Individuals

1. At all times relevant to this Information:
 - a. Defendant BILLIE F. THOMAS, who was known as "Billie Mohamed," by others, was a City of East Orange ("East Orange") New Jersey Construction Code official whose duties and responsibilities included, among other things, ensuring proper administration, supervision, and enforcement of East Orange's Building Code.
 - b. There was an individual who owned a store in East Orange, New Jersey (the "store owner"). The store owner regularly purchased and sold goods and services in interstate commerce. The store owner was attempting to expand the store. In connection with the expansion, and in order to operate the store, the store owner had to secure a certificate of occupancy

("CO") from East Orange. More specifically, to obtain a CO, various East Orange inspectors had to inspect and approve the work performed in connection with the store's expansion.

c. R.T. was a contractor who conducted business in East Orange and was an associate of defendant BILLIE F. THOMAS.

d. There was an individual who managed an apartment building in East Orange (the "building manager"). In connection with his duties and responsibilities, the building manager regularly purchased and sold goods and services in interstate commerce. In order to prepare individual apartments for the rental market, the building manager was attempting to renovate several apartments in the building. In connection with the renovation of these individual apartments, the building manager had to secure building permits and other construction related certificates from East Orange.

e. There was an associate of defendant BILLIE F. THOMAS who was attempting to assist the building manager in securing the permits and certificates that would allow the building manager to renovate and rent apartments in the building manager's building (the "CW"). The CW was cooperating with federal law enforcement.

Extortionate Activity

2. Between in or about February 2007 and in or about October 2007, defendant BILLIE F. THOMAS agreed to assist the store owner in securing inspections that would allow the store owner to obtain a CO from East Orange. Defendant BILLIE F. THOMAS, through R.T., informed the store owner that the store owner had to pay thousands of dollars, in cash, to defendant BILLIE F. THOMAS in order for the store owner to secure the necessary inspections and a CO. Through R.T., defendant BILLIE F. THOMAS thereafter accepted approximately \$7,000 in cash payments from the store owner at various locations in and around East Orange. Defendant BILLIE F. THOMAS accepted the cash payments from the store owner with the understanding that defendant BILLIE F. THOMAS would be influenced in his official capacity as an East Orange Construction Code official.

3. Between in or about August 2008 and in or about October 2008, defendant BILLIE F. THOMAS agreed to assist the building manager in securing inspections that would allow the building manager to obtain building permits, and other inspection related documents, from East Orange. Defendant BILLIE F. THOMAS informed the building manager, through the CW, that the building manager had to pay thousands of dollars, in cash, to defendant BILLIE F. THOMAS if the building manager expected to secure certain building permits and inspection related documents. Defendant

BILLIE F. THOMAS made the demand for cash payments from the building manager with the understanding that defendant BILLIE F. THOMAS would be influenced in his official position as an East Orange Construction Code official.

The Charge

4. From in or about February 2007 to in or about October 2007, in Essex County, in the District of New Jersey and elsewhere, defendant

BILLIE F. THOMAS, a/k/a "Billie Mohamed"

and others, did knowingly and willfully attempt to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting and agreeing to accept corrupt payments, that were paid by the store owner and demanded from the building manager, with their consent, in exchange for defendant BILLIE F. THOMAS's official assistance in City of East Orange government matters as specific opportunities arose.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

PAUL J. FISHMAN
UNITED STATES ATTORNEY