

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 07-
 :
 v. : 18 U.S.C. §§ 1951(a) and 2
 :
 MAURICE CALLAWAY, : I N F O R M A T I O N
 a/k/a "Pete Callaway" :

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

Attempted Extortion Under Color of Official Right

1. At all times relevant to this Information:

a. Defendant MAURICE CALLAWAY, a/k/a "Pete Callaway," served as a member of the Pleasantville Board of Education (hereinafter "PBOE") in Pleasantville, New Jersey. In his capacity as an elected board member, defendant CALLAWAY's duties included, but were not limited to, participating in the allocation of school district resources, establishing district policy and approving certain district expenditures and contracts, to include contracts for insurance brokerage services and roofing services.

b. Two cooperating witnesses ("CW-1" and "CW-2") purported to be representatives of companies capable of providing insurance brokerage services (the "Insurance Brokerage Business") and roofing services (the "Roofing Business") to governmental

entities. As represented by these individuals, these businesses were based in New Jersey, did business in various states, and paid for goods and services in interstate commerce.

2. From in or about May 2006 to in or about September 2006, on occasions which law enforcement authorities recorded, defendant CALLAWAY agreed to accept and accepted, through intermediaries, at least approximately \$13,000 in exchange for his official assistance in obtaining contracts from the PBOE for the Insurance Brokerage Business and the Roofing Business. Specific instances of this corrupt conduct included, but were not limited to, as follows:

a. On or about May 24, 2006, in Egg Harbor Township, New Jersey, defendant CALLAWAY, through an intermediary acting at defendant CALLAWAY's direction, accepted a corrupt payment of \$10,000 from CW-2. This payment, which was previously solicited by defendant CALLAWAY, was accepted in exchange for defendant CALLAWAY's official assistance in obtaining roofing work for the Roofing Business from the PBOE.

b. On or about June 5, 2006, in Egg Harbor Township, New Jersey, defendant CALLAWAY, through an intermediary acting at defendant CALLAWAY's direction, accepted two separate corrupt payments of \$1,500 each from CW-2. Each payment was previously solicited by defendant CALLAWAY, and was accepted in exchange for defendant CALLAWAY's official assistance in obtaining roofing

work for the Roofing Business from the PBOE.

c. On or about September 12, 2006, as a consequence of the corrupt agreement, defendant CALLAWAY, among other PBOE members, voted to pass a resolution authorizing the Insurance Brokerage Business to provide insurance brokerage services to the PBOE.

d. Prior to September 12, 2006, defendant CALLAWAY agreed to vote in favor of the resolution described in subparagraph (c) in exchange for corrupt payments already received and to be received through PBOE member Jayson G. Adams from the CWs.

3. From in or about May 2006 to in or about September 2006, in Atlantic County, in the District of New Jersey and elsewhere, defendant

MAURICE CALLAWAY
a/k/a "Pete Callaway"

did knowingly and willfully attempt to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by directly and indirectly accepting and agreeing to accept corrupt payments that were paid by another, with that person's consent, in exchange for defendant CALLAWAY's official influence and assistance in attempting to obtain insurance brokerage and roofing contracts from the PBOE as specific opportunities arose.

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

CHRISTOPHER J. CHRISTIE
United States Attorney