

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-
 :
 v. : 18 U.S.C. § 1951(a)
 :
 DAVID THOMAS : 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 that:

Conspiracy to Commit Extortion Under Color of Official Right

1. At all times relevant to this Information:

a. Defendant DAVID THOMAS (hereinafter, "defendant THOMAS") operated a dormant contracting company (hereinafter, "the Company").

b. Two cooperating witnesses ("CW-1" and "CW-2" or, collectively, "the CWs") purported to be representatives of companies capable of providing insurance brokerage services and roofing services to governmental entities. As represented by these individuals, these companies were based in New Jersey, did business in various states, and paid for goods and services in interstate commerce.

c. Co-conspirators Jayson G. Adams and Maurice Callaway (hereinafter, "Adams" and "Callaway," respectively) served as elected members of the Pleasantville Board of Education (hereinafter "PBOE") in Pleasantville, New Jersey. On various

occasions, from in or about May 2006 to in or about November 2006, Adams and Callaway accepted numerous corrupt payments from the CWs, directly and indirectly, in exchange for their official assistance in attempting to obtain contracts from the PBOE for the insurance brokerage company and the roofing company.

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

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did knowingly and willfully conspire and agree with Adams, Callaway and others to obstruct, delay and affect interstate commerce by extortion under color of official right - that is, by agreeing to obtain and obtaining money that was paid by another, with consent, for the benefit of Adams and Callaway, in exchange for Adams's and Callaway's official assistance, action and influence as specific opportunities arose.

3. It was an object of the conspiracy that defendant THOMAS, Adams, Callaway and others solicited, accepted and agreed to accept, corrupt cash payments from CW-2 in exchange for Adams's and Callaway's official assistance, action and influence in attempting to obtain contracts from the PBOE for the insurance brokerage and roofing companies.

4. It was a part of the conspiracy that defendant THOMAS served as an intermediary that accepted checks made payable to

the Company totaling approximately \$23,700 in corrupt payments via Adams from CW-2, on behalf of Adams and Callaway, which were deposited into the Company's bank account to conceal and disguise the true nature of the payments. Thereafter, defendant THOMAS provided cash payments of equal value to Adams, who later delivered the payments to Callaway.

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


PAUL J. FISHMAN
United States Attorney

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INFORMATION

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