

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14-
v. :
: 18 U.S.C. § 666(a)(1)(b)
DONNA SCHIERECK : 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:

1. Defendant DONNA SCHIERECK worked for New Jersey Transit in various capacities, including as a supervisor, for over twenty years.

2. At all times relevant to this Information:

- a. New Jersey Transit ("NJT") was a state government agency, administering New Jersey's public transportation service. NJT received federal funds assistance in excess of \$10,000 in calendar year 2012.
- b. There was a Lakewood, New Jersey company (the "Company") that conducted, among other things, professional powerwashing.
- c. There was a person who was the Vice President and Secretary of the Company (the "Vice President").
- d. There was another individual who was the President of the Company ("the President").
- e. There was a witness who was cooperating with the federal authorities ("CW"), who worked for NJT. CW began cooperating with federal authorities in or about April 2012, after CW was recorded

participating in a bribery and mail fraud scheme.

3. In or about September 2012, during a recorded telephone conversation between the Vice President and CW, the Vice President discussed with CW the need for CW to assist the Company with securing the 2012-2013 NJT snow removal work for the station located in Trenton (hereinafter the "Trenton Snow Work"), for which the Company would provide CW with \$20,000. The Vice President explained to CW that the Vice President would not be able to "do it all at once," referring to the Vice President's inability to provide CW with the full \$20,000 payoff in one lump sum, rather, the Vice President explained that the Vice President would have to "get the snow first," referring to the Vice President's need for NJT to pay the Company for snow removal first, before the Vice President could pay CW.

4. On or about October 10, 2012, during an unrecorded conversation, SCHIERECK and CW discussed, while driving in a vehicle together in New Jersey, the company NJT officials planned to utilize for the Trenton Snow Work. SCHIERECK told CW that NJT probably was not going to continue to utilize the Company for the removal of snow at the station in Trenton. SCHIERECK was informed by CW that the Company had offered CW \$16,000 to maintain the Trenton Snow Work for the Company. SCHIERECK further was informed by CW that CW would

provide her with \$8,000 if she maintained the Trenton Snow Work for the Company.

5. On or about October 11, 2012, during a recorded telephone conversation between SCHIERECK and CW, SCHIERECK stated to CW: "You owe me eight grand." CW asked SCHIERECK, "you got it?" SCHIERECK responded "uh huh," meaning that SCHIERECK had maintained the Trenton Snow Work for the Company. SCHIERECK and CW discussed the ease with which SCHIERECK maintained the Trenton Snow Work for the Company. SCHIERECK was told by CW that as a result of the ease in maintaining the Trenton Snow Work for the Company, SCHIERECK should get only \$5,000. SCHIERECK responded that SCHIERECK should get \$10,000 "cause [the Company] were getting nothing," indicating that without SCHIERECK's assistance, NJT would not have utilized the Company for the Trenton Snow Work. SCHIERECK further told CW that she wanted her house powerwashed, indicating that SCHIERECK wanted the Company to powerwash her house as additional benefit in consideration for her assistance with maintaining the Trenton Snow Work for the Company.

6. On or about October 11, 2012, in Ocean County, New Jersey, during a recorded telephone conversation between the Vice President and CW, the Vice President was told by CW that the Company "got the snow in Trenton," meaning that NJT decided to continue to utilize the Company for snow removal at the station located in Trenton. The Vice President further was informed by CW that in order

for CW to secure the Trenton Snow Work for the Company, CW had "promised somebody eight grand." The Vice President informed CW that the Vice President would give CW \$8,000 when the Vice President got NJT's first payment for snow removal, and, after that, the Vice President would pay CW the remaining \$12,000.

7. On or about October 25, 2012, in Ocean County, New Jersey, during a recorded telephone conversation between SCHIERECK and CW, SCHIERECK informed CW that she was waiting for "our guys" to powerwash the front of her house, referring to the Company. SCHIERECK concluded by stating: "that and eight grand'll get you a job," meaning that by paying SCHIERECK \$8,000 and powerwashing her house, the Company was able to maintain the Trenton Snow Work.

8. On or about October 25, 2012, workers from the Company powerwashed the front of SCHIERECK's home in Jackson, New Jersey, according to law enforcement surveillance.

9. On or about November 5, 2012, the Company removed snow from the NJT Trenton station, and subsequently invoiced NJT for the snow removal.

10. From in or about September 2012 to in or about December 2012, in Ocean County, in the District of New Jersey, and elsewhere, defendant

DONNA SCHIERECK

being an agent of a State government agency, did knowingly and corruptly solicit and demand for her benefit, and accept and agree

to accept things of value intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of such agency involving things of value of \$5,000 and more.

In violation of Title 18, United States Code, Section 666(a)(1)(B) and Section 2.

Paul J. Fishman /rah
PAUL J. FISHMAN
UNITED STATES ATTORNEY