

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-
 :
 v. : 18 U.S.C. § 371
 :
 EDWARD O'NEILL : 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. At all times relevant to this Information:
 - a. Defendant EDWARD O'NEILL was the President of PPW Contracting, Inc.
 - b. PPW Contracting, Inc. ("PPW") was a Lakewood, New Jersey company that conducted, among other things, professional powerwashing.
 - c. There was another individual who was the Vice President and Secretary of PPW (the "Vice President").
 - d. 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 for each year in 2011, 2012 and 2013.
 - 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.
 - f. There was a supervisor with NJT (the "NJT Supervisor").

The Bribery Conspiracy

2. From in or about September 2011 to in or about May 2013, in Ocean County, in the District of New Jersey, and elsewhere, defendant

EDWARD O'NEILL

did knowingly and intentionally conspire with the Vice President to corruptly give, offer, and agree to give things of value to an agent of a State government agency, with the intent to influence and reward the agent, in connection with a business, transaction and series of transactions of such agency involving a thing of value of \$5,000 and more, contrary to Title 18, United States Code, Section 666(a)(2).

The Object of the Conspiracy

3. The object of the conspiracy was to obtain snow removal contracts from NJT through bribes that defendant EDWARD O'NEILL and the Vice President paid and agreed to pay.

Manner and Means of the Conspiracy

4. It was a part of the conspiracy that, from in or about September 2011 to in or about March 2012, defendant EDWARD O'NEILL and the Vice President agreed to give and gave CW approximately \$20,000 in exchange for CW's assistance with securing the 2011-2012 NJT snow removal contract for the NJT station located in Trenton, New Jersey.

5. From in or about October 2011 to in or about March 2012, PPW removed snow from the NJT station located in Trenton, New

Jersey. NJT paid PPW for its snow removal services.

6. It was further a part of the conspiracy that, from in or about September 2012 to in or about April 2013, defendant EDWARD O'NEILL and the Vice President agreed to give CW another \$20,000, \$8,000 of which was to go the NJT Supervisor, in exchange for CW's and the NJT Supervisor's assistance with securing the 2012-2013 NJT snow removal contract for the NJT station located in Trenton, New Jersey.

7. From in or about November 2012 to in or about March 2013, PPW removed snow from the NJT station located in Trenton, New Jersey. NJT paid PPW for its snow removal services.

Overt Acts

8. In furtherance of the conspiracy and in order to effect the object thereof, in or about January 2012, defendant EDWARD O'NEILL made and caused to be made, in Toms River, New Jersey and elsewhere, a cash bribe payment of approximately \$8,000 to CW.

In violation of Title 18, United States Code, Section 371.

Paul J. Fishman/rah

PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

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INFORMATION FOR

Title 18, United States Code, Section 371

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