

FILED

FEB 11 2003

DONALD E. PHELAN
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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 472-03-1

Superior Court

Docket Number 03-02-00030-8

STATE OF NEW JERSEY)

INDICTMENT

v.)

MAUREEN A. MILAN)

The Grand Jurors of and for the State of New Jersey, upon their oaths,
present that:

COUNT ONE

(Official Misconduct - Second Degree)

MAUREEN A. MILAN

between on or about February 23, 1996, and on or about July 28, 2002, at the
City of Newark, at the City of Orange and at the Township of West Orange, all
in the County of Essex; at the Town of Westfield and at the Township of
Springfield, both in the County of Union; at the City of Jersey City, in the
County of Hudson; at the City of Atlantic City, in the County of Atlantic; at the
Borough of East Rutherford, in the County of Bergen, all within the State of
New Jersey; in the states of California, Florida, Illinois, Nevada, New Mexico,
New York and Texas; in the District of Columbia; in the Commonwealth of
Pennsylvania, and in the countries of Canada and the United Kingdom,
elsewhere, and within the jurisdiction of this Court, being a public servant and
with purpose to obtain a benefit for herself or another, knowingly did refrain
from performing a duty which was imposed upon her by law and which was
clearly inherent in the nature of her office, that is, MAUREEN A. MILAN, while

serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, and thereby having duties and responsibilities in connection with the purchase or acquisition of property by New Jersey Transit Corporation, an instrumentality of the State, did solicit and did receive gifts and gratuities from representatives of vendors to the State, in violation of the duty imposed upon her by N.J.S.A. 52:34-19, and, subsequent to April 17, 2000, also in violation of the duty imposed upon her by N.J.S.A. 2C:27-4a(2), contrary to the provisions of N.J.S.A. 2C:30-2b and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT TWO

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about April 28, 2000, and on or about April 29, 2000, at the City of Newark, in the County of Essex, at the City of Washington, in the District of Columbia, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive payment of the costs of a stay in Washington, D.C., for herself and her escort, including room charges at the Willard Inter-Continental Hotel, telephone charges, food and beverage charges, and the cost of flowers and in-room movies, with a pecuniary value of approximately \$878.93, from an agent of Nova BUS, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT THREE

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

on or about October 22, 2000, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive two tickets to Game Two of the 2000 World Series, held at Yankee Stadium, with a pecuniary value of approximately \$320, from an agent of Atlantic Detroit Diesel-Allison, a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT FOUR

(Attempted Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about October 22, 2000, and on or about October 26, 2000, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did attempt to receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive two tickets to Game Seven of the 2000 World Series, scheduled to be held at Yankee Stadium, with a face value of approximately \$320, from an agent of Atlantic Detroit Diesel-Allison, a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2), N.J.S.A. 2C:2-6 and N.J.S.A. 2C:5-1, and against the peace of this State, the government and the dignity of the same.

COUNT FIVE

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

on or about May 12, 2001, at the City of Newark, in the County of Essex, at the City of Las Vegas, in the State of Nevada, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive a dinner for herself and a guest at the Bellagio Restaurant, with a pecuniary value of approximately \$464.14, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT SIX

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about May 19, 2001, and on or about May 23, 2001, at the City of Newark, in the County of Essex, at the City of London, in the United Kingdom, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive payment of costs of a stay in London, including hotel room charges, food and beverage charges, laundry and pressing charges, hairdresser and health club charges, concierge charges, telephone, gratuity and service charges, and transportation charges, with a pecuniary value of approximately \$2,763.19, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT SEVEN

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about May 31, 2001, and on or about July 13, 2001, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive four tickets to the Broadway play "The Producers," with a pecuniary value of approximately \$1,600, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT EIGHT

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about June 29, 2001, and on or about July 13, 2001, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive a ticket to the Broadway play "The Producers," with a pecuniary value of approximately \$390, from an agent of Atlantic Detroit Diesel-Allison, a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT NINE

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about July 23, 2001, and on or about July 25, 2001, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive two tickets to a Madonna concert at Madison Square Garden, with a pecuniary value of approximately \$1,100, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT TEN

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about August 6, 2001, and on or about August 15, 2001, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive two tickets to a Sade concert at the Lincoln Center, with a pecuniary value of approximately \$900, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT ELEVEN

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

on or about September 29, 2001, at the City of Newark, in the County of Essex, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive payment for services on her behalf at the Ettore Salon, with a pecuniary value of approximately \$459, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT TWELVE

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

between on or about October 16, 2001, and on or about October 21, 2001, at the City of Newark, in the County of Essex, at the City of New York, in the State of New York, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties by the said MAUREEN A. MILAN, that is, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, MAUREEN A. MILAN did receive two tickets to a Yankees playoff baseball game, with a pecuniary value of approximately \$1,100, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT THIRTEEN

(Unlawful Benefits for Official Behavior - Second Degree)

MAUREEN A. MILAN

on or about October 26, 2001, at the City of Newark, in the County of Essex, at the City of Chicago, in the State of Illinois, elsewhere, and within the jurisdiction of this Court, as a public servant, directly and indirectly, knowingly did receive a benefit, valued at greater than \$200, from another who is or was in a position, different from that of a member of the general public, to benefit, directly or indirectly, from a violation of official duty or the performance of official duties, that is, MAUREEN A. MILAN, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, did receive a dinner at the Everest Restaurant, with a pecuniary value of approximately \$290.33, from an agent of Motor Coach Industries, Inc., a business enterprise which is and was a vendor of services and goods, directly and indirectly, to New Jersey Transit Corporation, contrary to the provisions of N.J.S.A. 2C:27-4a(2) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and the dignity of the same.

COUNT FOURTEEN

(Receipt of Gratuity by State Employee - Fourth Degree)

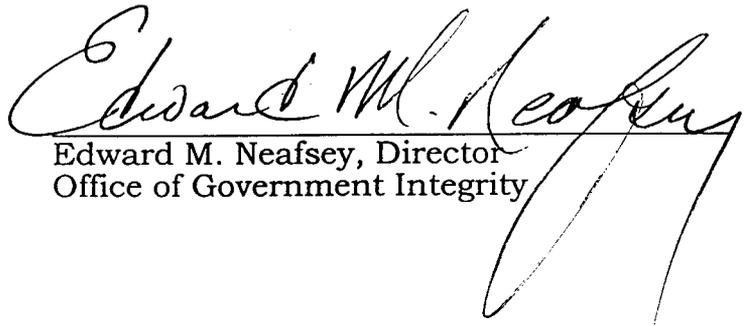
MAUREEN A. MILAN

between on or about April 14, 1998, and on or about July 28, 2002, at the City of Newark, in the County of Essex, elsewhere, and within the jurisdiction of this Court, being a person employed by the State and MAUREEN A. MILAN having duties and responsibilities in connection with the purchase or acquisition of property or services by an instrumentality of the State, knowingly did solicit and receive gifts or gratuities from or on behalf of sellers or suppliers who made, negotiated, solicited or offered to make contracts to sell or furnish property or services to an instrumentality of the State, that is, MAUREEN A. MILAN, while serving as Vice-President and General Manager of Bus and Light Rail Operations of New Jersey Transit Corporation, an instrumentality of the State, and having duties and responsibilities in connection with the purchase or acquisition of property and services by New Jersey Transit Corporation, did solicit and receive gifts or gratuities including tickets to entertainment and sporting events, meals, travel and other payments from representatives of Motor Coach Industries, Inc., Atlantic Detroit Diesel-Allison and Nova BUS, Inc., each a business enterprise which sells and furnishes property and

services to New Jersey Transit Corporation, contrary to the provisions of
N.J.S.A. 52:34-19 and N.J.S.A. 2C:2-6, and against the peace of this State, the
government and the dignity of the same.



Peter C. Harvey, Director
Division of Criminal Justice



Edward M. Neafsey, Director
Office of Government Integrity

A TRUE BILL:



, Foreperson

Dated: 2/11/2003