

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>Violations:</b>
<b>DORIAN PARSLEY</b>		<b>18 U.S.C. § 371 (conspiracy – 1 count)</b>
<b>STEPFON FLOWERS</b>	<b>:</b>	<b>18 U.S.C. §§ 1343, 1346 (honest services</b>
<b>WILLIAM CHEESEMAN</b>		<b>fraud - 2 counts)</b>
<b>CHAD HARRIS</b>	<b>:</b>	<b>18 U.S.C. § 666(a)(1)(B) (bribery – 3</b>
		<b>counts)</b>
		<b>18 U.S.C. § 666(a)(2) (bribery – 3 counts)</b>
		<b>18 U.S.C. § 2 (aid and abet)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The Philadelphia Police Department constituted an “organization” which received annual benefits in excess of \$10,000 in each of the calendar years 2011, 2012, and 2013 under federal programs involving grants, contracts, subsidies, loans, guarantees, and other forms of federal assistance, in connection with the Edward Byrne Memorial Justice Center Grant Program allowing states and local government to support a broad range of activities to prevent and control crime and improve the criminal justice system.

2. From on or about January 20, 1998 to in or about December 2013, defendant DORIAN PARSLEY was employed by the Philadelphia Police Department (“PPD”) as a civilian dispatcher and as such, was its agent.

3. As part of her employment, defendant DORIAN PARSLEY was responsible for dispatching police patrol units to locations where they were needed throughout the City and

responding to police officers' radio requests, which included running license plates and vehicle registrations. In order for defendant PARSLEY to run license plates and vehicle registrations, she would input the information through the PPD dispatch computer. PPD computers automatically access the National Crime Information Center ("NCIC") located in West Virginia when this information is inputted.

4. In or about February 2011, the PPD instituted a rotational towing program whereby tow truck operators who were licensed and in good standing could request to be placed on a call list with the PPD. When tow truck assistance was needed, dispatch called a tow truck operator directly off the call list. The information about the location where a tow truck was needed was to remain confidential until given by dispatch to the appropriate tow truck operator from the call list. This rotational program was instituted as a public safety and consumer protection measure enacted by the City of Philadelphia, Philadelphia Code, Chapter 9 § 605.

5. The City of Philadelphia and PPD implemented the rotational program to stop wreck chasing and to prevent accident victims from being taken advantage of by tow truck operators who engaged in price gouging. The program came in response to a series of highly-publicized, violent encounters between tow truck operators who competed for the highly lucrative work of towing cars damaged in accidents.

6. As a civilian dispatcher, defendant DORIAN PARSLEY agreed to follow the policies and procedures of the PPD. As part of her employment, on October 29, 2006, defendant DORIAN PARSLEY signed the Officer/Employee Acknowledgment of Receipt and Commitment to Comply with the Philadelphia Ethics Code. Defendant PARSLEY acknowledged that the City's Code of Ethics was binding on her, which included a prohibition from receiving gifts, loans, gratuities, or favors that might reasonably be expected to influence

her in her position in the discharge of her official duties. Defendant PARSLEY also acknowledged a prohibition of disclosing or making available confidential information concerning the affairs of the City without proper legal authorization for the purpose of advancing the financial interest of herself or others.

7. Defendant STEPFON FLOWERS was a tow truck operator who worked for various auto repair/body shops and towing services, including K&B Auto body in Philadelphia.

8. Defendant WILLIAM CHEESEMAN was one of the owners of K&B Auto body.

9. Defendant CHAD HARRIS was a tow truck operator who worked for various auto repair/body shops, including K&B Auto.

10. From in or about February 2011 to in or about December 2013, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**DORIAN PARSLEY,  
STEPFON FLOWERS,  
WILLIAM CHEESEMAN, and  
CHAD HARRIS**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is:

(1) for defendant DORIAN PARSLEY to corruptly accept and agree to accept anything of value from any person, intending to be influenced and rewarded as an agent of an organization, government, or agency in connection with any business, transaction, and series of transactions involving anything of value of \$5,000 or more of an organization, government, or agency that receives more than \$10,000 under a federal program during a one year period, in violation of Title 18, United States Code, Section 666(a)(1)(B);

(2) for defendants STEPFON FLOWERS, WILLIAM CHEESEMAN, and CHAD HARRIS to corruptly give, offer, and agree to give anything of value to any person,

intending to influence and reward an agent of an organization, government, or agency in connection with any business, transaction, and series of transactions involving anything of value of \$5,000 or more of an organization, government, or agency that received more than \$10,000 under a federal program during a one year period, in violation of Title 18, United States Code, Section 666(a)(2);

(3) to devise and intend to devise a scheme and artifice to defraud the City of Philadelphia, and its citizens of their right to defendant DORIAN PARSELY's honest services, through bribes and kickbacks, by use of interstate wire transmissions, in violation of Title 18, United States Code, Sections 1343 and 1346.

#### **MANNER AND MEANS**

It was part of the conspiracy that:

11. Defendants DORIAN PARSLEY and STEPFON FLOWERS, WILLIAM CHEESEMAN, and CHAD HARRIS knowingly devised and intended to devise a scheme and artifice to defraud the City of Philadelphia, the Philadelphia Police Department, and the citizens of Philadelphia of defendant PARSLEY's honest services through a bribery and kickback scheme, whereby PARSLEY used her position as a civilian radio dispatcher to provide confidential information as to the locations of automobile accidents, the locations of PPD squad cars, and vehicle registration information to tow truck operators who had provided her with bribery/kickbacks.

12. In providing certain tow truck operators confidential police information, that is, the locations of car accidents, disabled vehicles, and any situation where police would request tow truck assistance, prior to calling the appropriate tow truck operator identified on the call list, defendant DORIAN PARSLEY circumvented the PPD's rotational towing program and

surreptitiously texted these locations that came into PPD dispatch from her personal cellphone directly to certain tow truck operators who paid defendant PARSLEY cash bribes in exchange for the information.

13. For an additional cash fee, defendant DORIAN PARSLEY also agreed to provide certain tow truck operators with confidential and personal information, that is, the name and address of a vehicle owner by running the license plate and vehicle registration through the PPD dispatch computer. PPD computers automatically access the National Crime Information Center (“NCIC”) located in West Virginia when a vehicle registration was inputted.

14. Defendant DORIAN PARSLEY also agreed to provide certain tow truck operators with the location of police squad cars as part of the bribe payments.

15. Defendant DORIAN PARSLEY accepted weekly cash bribe payments of approximately \$100-\$200 from certain tow truck operators in exchange for the confidential police information.

16. Defendants STEPFON FLOWERS, WILLIAM CHEESEMAN, and CHAD HARRIS were tow truck operators who paid bribes to defendant DORIAN PARSLEY each week in order to obtain confidential information from her.

17. Defendant STEPFON FLOWERS promoted the scheme by providing other tow truck operators, such as defendants WILLIAM CHEESEMAN and CHAD HARRIS, to defendant DORIAN PARSLEY. Because defendant FLOWERS promoted the scheme on defendant PARSLEY’s behalf, defendant FLOWERS sometimes paid a reduced bribe payment rate.

18. Defendant STEPFON FLOWERS collected some of the weekly bribe payments for defendant DORIAN PARSLEY.

## **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants DORIAN PARSLEY, STEPFON FLOWERS, WILLIAM CHEESEMAN, and CHAD HARRIS committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. Between approximately February 2011 and December 2013, defendant STEPFON FLOWERS made approximately weekly payments to defendant DORIAN PARSLEY in amounts ranging from \$100 to \$150.

2. Between approximately February 2011 and December 2013, defendant DORIAN PARSLEY provided confidential information as to the location of automobile accidents and the location of PPD squad cars on a daily basis to defendant STEPFON FLOWERS in return for the approximately weekly bribe payments she received from him.

3. In or about September 2012, defendant STEPFON FLOWERS gave defendant WILLIAM CHEESEMAN, one of the owners of K&B auto body shop, defendant DORIAN PARSLEY's telephone number so that defendant PARSLEY could provide confidential information as to location of automobile accidents to defendant CHEESEMAN in return for weekly bribe payments.

4. Between approximately September 2012 and December 2013, defendant WILLIAM CHEESEMAN made approximately weekly payments to defendant DORIAN PARSLEY in amounts ranging from \$100 to \$200.

5. On or about April 2013, defendant CHAD HARRIS, a tow truck operator employed at times by K&B auto body shop, received defendant DORIAN PARSLEY's telephone number from a co-conspirator so that defendant PARSLEY could provide confidential

information as to location of automobile accidents to defendant HARRIS in return for approximately weekly bribe payments.

6. Between approximately April 2013 and October 2013, defendant CHAD HARRIS made approximately weekly payments to defendant DORIAN PARSLEY in the amount of \$200.

7. On or about April 22, 2013, defendant STEPHON FLOWERS introduced a confidential source (CS) working for the Federal Bureau of Investigation to defendant DORIAN PARSLEY so that defendant PARSLEY could provide confidential information as to location of automobile accidents to CS in return for weekly bribe payments.

8. On or about October 27, 2013, defendant STEPFON FLOWERS asked defendant DORIAN PARSLEY via a text message to run a license plate number for him.

7. On or about October 27, 2013, defendant DORIAN PARSLEY accessed the NCIC data base in order to obtain the registration information associated with the license plate number given to her by defendant STEPFON FLOWERS.

8. On or about October 27, 2013, defendant DORIAN PARSLEY texted the registration information to defendant STEPFON FLOWERS.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 1 through 3, 5, and 7 through 8 of Count One are incorporated here.

2. From in or about February 2011 to in or about November 2013, in the Eastern District of Pennsylvania, defendant

**STEPFON FLOWERS**

corruptly gave, offered, and agreed to give anything of value, that is, multiple weekly cash bribe payments, to defendant DORIAN PARSELY, an agent of an organization, that is, the Philadelphia Police Department, which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, in connection with a transaction or series of transactions of the Philadelphia Police Department involving anything of value of \$5,000 or more.

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



**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 3 and 4 of Count One are incorporated here.
  
2. From in or about September 2012 to in or about November 2013, in the Eastern District of Pennsylvania, defendant

**WILLIAM CHEESEMAN**

corruptly gave, offered, and agreed to give anything of value, that is, multiple weekly cash bribe payments, to defendant DORIAN PARSLEY, an agent of an organization, that is, the Philadelphia Police Department, which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, in connection with a transaction or series of transactions of the Philadelphia Police Department involving anything of value of \$5,000 or more.

In violation of Title 18, United States Code, Sections 666(a)(2), (b) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 5 and 6 of Count One are incorporated here.

2. From in or about April 2013 to in or about November 2013, in the Eastern District of Pennsylvania, defendant

**CHAD HARRIS**

corruptly gave, offered, and agreed to give anything of value, that is, multiple weekly cash bribe payments, to defendant DORIAN PARSELY, an agent of an organization, that is, the Philadelphia Police Department, which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, in connection with a transaction or series of transactions of the Philadelphia Police Department involving anything of value of \$5,000 or more.

In violation of Title 18, United States Code, Sections 666(a)(2), (b) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 1 through 3, 5, and 7 through 8 of Count One are incorporated here.

2. From in or about February 2011 to in or about November 2013, in the Eastern District of Pennsylvania, defendant

**DORIAN PARSLEY,**

an agent of an organization, that is, the Philadelphia Police Department, which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, corruptly accepted and agreed to accept a thing of value from defendant STEPFON FLOWERS for his benefit and the benefit of another, intending to be influenced and rewarded in connection with a transaction or series of transactions of the Philadelphia Police Department involving anything of value of \$5,000 or more, that is, defendant PARSLEY accepted and agreed to accept multiple weekly cash bribe payments.

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 3 and 4 of Count One are incorporated here.

2. From in or about September 2012 to in or about November 2013, in the Eastern District of Pennsylvania, defendant

**DORIAN PARSLEY,**

an agent of an organization, that is, the Philadelphia Police Department, which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, corruptly accepted and agreed to accept a thing of value from defendant WILLIAM CHEESEMAN for his benefit and the benefit of another, intending to be influenced and rewarded in connection with a transaction or series of transactions of the Philadelphia Police Department involving anything of value of \$5,000 or more, that is, defendant PARSLEY accepted and agreed to accept multiple weekly cash bribe payments.

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

## COUNT SEVEN

### THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 5 and 6 of Count One are incorporated here.
2. From in or about April 2013 to in or about November 2013, in the Eastern District of Pennsylvania, defendant

### **DORIAN PARSLEY,**

an agent of an organization, that is, the Philadelphia Police Department, which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan and other form of federal assistance, corruptly accepted and agreed to accept a thing of value from defendant CHAD HARRIS for his benefit and the benefit of another, intending to be influenced and rewarded in connection with a transaction or series of transactions of the Philadelphia Police Department involving anything of value of \$5,000 or more, that is, defendant PARSLEY accepted and agreed to accept multiple weekly cash bribe payments.

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

**COUNTS EIGHT AND NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 9 and 11 through 18 and overt acts 1 through 3, 5, and 7 through 8 of Count One are incorporated here.
2. On or about each of the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DORIAN PARSLEY and  
STEPFON FLOWERS**

for the purpose of executing the scheme described above in paragraphs 1 through 9 and 11 through 18, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<b>COUNT</b>	<b>DATE</b>	<b>DESCRIPTION</b>
Eight	May 31, 2013	Defendant PARSLEY ran a license plate and vehicle registration through NCIC to obtain vehicle owner information for CS.
Nine	October 27, 2013	Defendant PARSLEY ran a license plate and vehicle registration through NCIC to obtain vehicle owner information for Stefon Flowers.

All in violation of Title 18, United States Code, Sections 1343, 1346 and 2.

**A TRUE BILL:**

**\_\_\_\_\_  
GRAND JURY FOREPERSON**

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ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**