

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

UNITED STATES OF AMERICA : **DATE FILED:** _____
v. : **CRIMINAL NO.** _____
JOSEPH GLYNN : **VIOLATION: 18 U.S.C. § 666(a)(1)(A)**
(theft in connection with federal program
funds - 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The City of Philadelphia Prison System was a department of the City of Philadelphia charged with housing and supervising inmates in all Philadelphia County Correctional Facilities. The mission of the Philadelphia Prison System was to provide a secure correctional environment that adequately detains persons accused or convicted of illegal acts; to provide programs, services, and supervision in a safe, lawful, clean, humane environment; and to prepare incarcerated persons for reentry into society.

2. The Alternative Special Detention Central Unit (ASDCU) located at 8101 State Road was one of the facilities managed by the Philadelphia Prison System. ASDCU housed inmates on work release programs and other minimum custody inmates.

3. The ASDCU facility contained a number of vending machines which were accessible to ASDCU inmates and staff. Forty percent of the revenues received by the prison system from these machines were deposited into an account labeled "Project 86" which was under the care, custody and control of the Philadelphia Prison System and was to be used to finance inmate expenses at ASDCU.

4. The City of Philadelphia Prison System constituted a "government agency" that received annual benefits in excess of \$10,000 in the calendar year 2005 under federal programs involving grants, contracts, subsidies, loans, guarantees and other forms of federal assistance, in connection with the reporting of illegal aliens incarcerated in the Philadelphia Prison System and the suspension of social security benefits to inmates in the Philadelphia Prison System.

5. Defendant JOSEPH GLYNN was employed by the Philadelphia Prison System since approximately April 11, 2005 in the position of Deputy Warden, ASDCU. As such, he was responsible to depositing vending machine revenues in the Project 86 account.

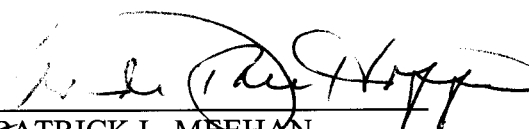
6. From on or about May 1, 2005 until on or about January 9, 2006, in the Eastern District of Pennsylvania, defendant

JOSEPH GLYNN,

while acting as an agent of the City of Philadelphia Prison System, an organization 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, embezzled and stole a thing of

value, that is, approximately \$14,800.00 in funds from the Project 86 account, an account under the care, custody and control of the City of Philadelphia Prison System.

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


FOL PATRICK L. MEEHAN
United States Attorney