

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
PATRICIA BRADLEY : **VIOLATIONS:**
TAMARA MITCHELL : **18 U.S.C. § 1951 (Hobbs Act extortion -**
: **4 counts)**
: **18 U.S.C. § 2 (aiding and abetting)**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Philadelphia Police Department was an agency whose primary function was to enforce the Pennsylvania Criminal Code in the City of Philadelphia, and protect the citizens from violations of criminal laws.

2. The Philadelphia Police Department hired civilian dispatchers, who were responsible for providing information and support to police officers via police radio. The dispatchers use a system of computer data bases to obtain current identifying information about persons and vehicles as that information is requested by police officers. The computer data bases are limited to law enforcement use.

3. Defendant PATRICIA BRADLEY was employed as a dispatcher for the Philadelphia Police Department from March 2003 until February 2006.

4. Defendant TAMARA MITCHELL was employed as a dispatcher for the Philadelphia Police Department from October 2001 until the present.

5. On or about August 4, 2003, defendant PATRICIA BRADLEY agreed with another person, known to the grand jury as "I.B.," who was not affiliated with any law enforcement organization, to obtain information relating to Pennsylvania license tag number DTM3904 from the Philadelphia Police Department computer data base system. Specifically, defendant BRADLEY obtained the name and address under which that license tag was registered.

6. Defendant PATRICIA BRADLEY accepted money from "I.B." in exchange for the name and address relating to the license tag.

7. When defendant PATRICIA BRADLEY obtained the information, she believed that "I.B." intended to commit a robbery at the address she obtained or against the person who operated the vehicle with the license tag, who defendant BRADLEY believed to be a drug dealer.

8. On or about August 4, 2003, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PATRICIA BRADLEY

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that defendant BRADLEY obtained and attempted to obtain property and things of value, that is, money, including a share of the proceeds of the planned robbery, in exchange for information from the Philadelphia Police Department computer data base, which was not due defendant BRADLEY, and her office, from "I.B." with the consent of "I.B.," under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are realleged here.
2. On or about July 12, 2004, defendant PATRICIA BRADLEY agreed with “I.B.” to obtain information relating to Pennsylvania license tag number EZS1268 from the Philadelphia Police Department computer data base system. Specifically, defendant BRADLEY obtained the name and address under which that license tag was registered.
3. “I.B.” promised to pay defendant PATRICIA BRADLEY money in exchange for the name and address relating to the license tag.
4. When defendant PATRICIA BRADLEY obtained the information, she believed that “I.B.” intended to commit a robbery at the address she obtained or against the person who operated the vehicle with the license tag, who defendant BRADLEY believed to be a drug dealer.
5. On or about July 12, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

PATRICIA BRADLEY

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that defendant BRADLEY obtained and attempted to obtain property and things of value, that is, money, including a share of the proceeds of the planned robbery, in exchange for information from the Philadelphia Police Department computer data base, which was not due defendant BRADLEY, and her office, from “I.B.” with the consent of “I.B.,” under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are realleged here.
2. On or about March 28, 2006, defendants PATRICIA BRADLEY and TAMARA MITCHELL agreed with "I.B." to obtain information, specifically, the name and address under which the license tag was registered, relating to New Jersey tag PAG70V, from the Philadelphia Police Department computer data base system.
3. Defendants PATRICIA BRADLEY and TAMARA MITCHELL accepted money from "I.B." in exchange for the name and address relating to the license tag.
4. When defendants BRADLEY and MITCHELL obtained the information, they believed that "I.B." intended to commit a robbery at the address they obtained or against the person who operated the vehicle with the license tag, who defendants BRADLEY and MITCHELL believed to be a drug dealer.
5. On or about March 31, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PATRICIA BRADLEY and
TAMARA MITCHELL**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that defendants BRADLEY and MITCHELL obtained and attempted to obtain property and things of value, that is, money, including a share of the proceeds of the planned robbery, in exchange for information from the Philadelphia Police

Department computer data base, which was not due defendants BRADLEY and MITCHELL, and their office, from "I.B." with the consent of "I.B.," under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are realleged here.
2. On or about May 4, 2006, defendants PATRICIA BRADLEY and TAMARA MITCHELL agreed with "I.B." to obtain information, specifically, the name and address under which the license tag was registered, relating to New Jersey tag LMF44H , from the Philadelphia Police Department computer data base system.
3. Defendants PATRICIA BRADLEY and TAMARA MITCHELL accepted money from "I.B." in exchange for obtaining the name and address relating to the license tag.
4. When defendants PATRICIA BRADLEY and TAMARA MITCHELL obtained the information, they believed that "I.B." intended to commit a robbery at the address they obtained or against the person who operated the vehicle with the license tag, who defendants BRADLEY and MITCHELL believed to be a drug dealer.
5. On or about May 6, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**PATRICIA BRADLEY and
TAMARA MITCHELL**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that defendants BRADLEY and MITCHELL obtained and attempted to obtain property and things of value, that is, money, including a share of the proceeds of the planned robbery, in exchange for information from the Philadelphia Police Department computer data base, which was not due

defendants BRADLEY and MITCHELL, and their office, from “I.B.” with the consent of “I.B.,”
under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY