

**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>DATE FILED: <u>July 29, 2010</u></b>
<b>PAUL KLING</b>	<b>:</b>	<b>VIOLATION:</b>
	<b>:</b>	<b>18 U.S.C. §§ 666(a)(2) and (b)</b>
	<b>:</b>	<b>(bribery in connection with a program</b>
	<b>:</b>	<b>receiving federal funds - 1 count)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. The City of Philadelphia Department of Records constituted a local government which received annual benefits in excess of \$10,000 in calendar year 2009 under Federal programs involving grants, contracts, subsidies, loans, guarantees, and other forms of federal assistance.
2. Defendant PAUL KLING owns and is employed by PSE Services, a company which, among other things, obtains and provides police incident reports, traffic accident reports and fire/emergency medical services (EMS) reports from the City of Philadelphia to clients, consisting of primarily law firms.
3. Defendant PAUL KLING schemed with Kelly Kaufmann Layre, charged elsewhere, who was an employee at the City of Philadelphia Department of

Records, to obtain police incident reports, traffic accident reports and fire/EMS reports, without authorization, for a fee significantly lower than the City rates. Specifically, defendant PAUL KLING paid Layre, in cash, \$5 or \$10 per report, which was significantly less than the City of Philadelphia rate of \$20 or \$25 per report, depending on the type purchased. Defendant PAUL KLING knew that Layre was accepting the cash for her personal use and not providing the cash payments to the City of Philadelphia.

4. On a weekly basis, defendant PAUL KLING requested multiple reports from Layre and personally obtained the reports from Layre's office in the City of Philadelphia Records Department in City Hall. When KLING obtained the reports from Layre, KLING paid Layre in cash.

5. From on or about January 2007 through on or about February 2010, defendant PAUL KLING obtained approximately 3,979 unauthorized reports from Layre, thus depriving the City of Philadelphia of approximately \$97,440 worth of fees for these reports. In exchange for these unauthorized reports, defendant PAUL KLING gave Layre approximately \$37,755 in cash for her personal use.

6. On numerous occasions, from in or about January 2009 through on or about December 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**PAUL KLING**

corruptly gave, offered, and agreed to give a thing of value, that is cash payments totaling approximately \$13,095 in cash payments to Kelly Kaufmann Layre, an employee in the City of Philadelphia Department of Records, Police & Fire Reports Unit and an agent of the City of Philadelphia, charged elsewhere, with the intent to influence and reward Layre, in connection

with any business, transaction, or series of transactions of the City of Philadelphia involving something of value of \$5,000 or more, that is Layre's providing him with traffic accident reports, police incident reports and fire/EMS reports at a price significantly below the \$35,490 the Department of Records would charge for such reports.

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

## **NOTICE OF FORFEITURE**

### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 666(a)(2), (b), set forth in Count One of this information, defendant

#### **PAUL KLING**

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, that constitutes or is derived from proceeds traceable to any offense constituting specified unlawful activity, as defined in Title 18, United States Code, Section 1956(c)(7).

#### **SUBSTITUTE ASSETS**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

then it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c) and 21 U.S.C. 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28,  
United States Code, Section 2461(c).

**A TRUE BILL:**

A handwritten signature in blue ink that reads "Peter F Schuch for". The signature is written in a cursive, flowing style. The word "for" is written in a smaller, more casual script at the end of the line.

**ZANE DAVID MEMEGER**  
**United States Attorney**