

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED: July 29, 2010**  
**KELLY KAUFMANN LAYRE** : **VIOLATION:**  
: **18 U.S.C. §§ 666(a)(1)(B) and (b)**  
: **(solicitation of a bribe in connection with**  
: **a program receiving federal funds -**  
: **1 count)**  
: **Notice of forfeiture**

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. The City of Philadelphia Department of Records was a local government agency with offices located at City Hall, Room 168, Philadelphia, Pennsylvania. Part of the stated mission of the City of Philadelphia Department of Records was to maintain, for public use, records of the City of Philadelphia and provide the public access to those records. To that end, one of the units of the City of Philadelphia Department of Records was the Police & Fire Reports Unit, which functioned to make accessible police and fire reports to the general public.
2. 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.

3. Defendant KELLY KAUFMANN LAYRE was an employee in the City of Philadelphia Department of Records, Police & Fire Reports Unit, since 1997, and as such was its agent. LAYRE was responsible for managing the general public's request for police incident reports, traffic accident reports and fire/emergency medical services (EMS) reports, which included printing the reports and processing payments for the reports in accordance with the City of Philadelphia's fee schedule. LAYRE provided services to both commercial vendors as well as walk-in customers. Any member of the public could purchase a police incident report or traffic accident report for a fee of \$25 or a fire/EMS report for a fee of \$20.

4. Defendant KELLY KAUFMANN LAYRE provided, without authorization, traffic accident reports, police incident reports and/or fire/EMS reports to Tina Meyrick, Paul Kling and Brian Daly, charged elsewhere, in exchange for cash payments for her personal use.

5. In this scheme, defendant KELLY KAUFMANN LAYRE received weekly requests from Meyrick, Kling and Daly via telephone, text messaging or facsimile, for dozens and up to hundreds of specific traffic accident reports, police incident reports and/or fire/EMS reports that were in the custody and control of the City of Philadelphia Department of Records. Meyrick, Kling and Daly were separately involved in businesses, part of which the purpose was to obtain such reports for clients, such as law firms and public reporting companies.

6. Defendant KELLY KAUFMANN LAYRE printed the reports requested by Meyrick, Kling and Daly from her City owned computer located in her office at City Hall, Room 168 during her work hours. Kling and Daly retrieved their respective requested reports from defendant KELLY KAUFMANN LAYRE at her office at least once per week. Defendant

KELLY KAUFMANN LAYRE personally delivered the reports requested by Meyrick to Meyrick or to a family member of Meyrick's at a pre-arranged location in Northeast Philadelphia. In exchange for these reports, Meyrick, Kling and Daly gave defendant KELLY KAUFMANN LAYRE cash, between \$5 and \$10 per report, which was significantly less than the City of Philadelphia's \$20 or \$25 fee requirement per report, depending on which type was purchased. Defendant KELLY KAUFMANN LAYRE used the cash provided by Meyrick, Kling and Daly for her personal use.

7. Defendant KELLY KAUFMANN LAYRE's corrupt scheme spanned from in or around January 2006 through in or around January 2010. During this period, defendant KELLY KAUFMANN LAYRE provided, without authorization, a total of approximately 24,094 reports to Meyrick, Daly and Kling, thus depriving the City of Philadelphia of approximately \$600,415 worth of fees for these reports. In exchange for these unauthorized reports, defendant KELLY KAUFMANN LAYRE accepted cash totaling approximately \$185,776 for her personal use.

8. On numerous occasions, from in or around January 2009 through in or around December 2009, defendant

**KELLY KAUFMANN LAYRE,**

while acting as an agent of a government agency which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance or other form of federal assistance, corruptly solicited and demanded for her own benefit, accepted and agreed to accept cash payments in excess of \$5,000, intending to be influenced and rewarded in connection with a series of transactions of the Department of Records

for the City of Philadelphia, in that defendant LAYRE accepted cash payments totaling approximately \$80,513, from Tina Meyrick, Paul Kling and Brian Daly in exchange for providing them with traffic accident reports, police incident reports and fire/EMS reports at a price significantly below the \$267,440 the Department of Records would charge for such reports.

In violation of Title 18, United States Code, Section 666(a)(1)(B), (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)(1)(B), (b), set forth in Count One of this information, defendant

**KELLY KAUFMANN LAYRE**

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:**

*Peter F Schenck for*

**ZANE DAVID MEMEGER**

**United States Attorney**