



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 TINA MARIE MEYRICK paid Layre, in cash, \$7 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 TINA MARIE MEYRICK 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 TINA MARIE MEYRICK requested multiple reports from Layre via facsimile and email transmissions. MEYRICK arranged for Layre to deliver the unauthorized reports to MEYRICK or a family member of MEYRICK's in Northeast Philadelphia. When the reports were delivered, MEYRICK paid Layre in cash.

5. From on or about January 2006 through on or about February 2010, defendant TINA MARIE MEYRICK obtained approximately 18,269 unauthorized reports from Layre, thus depriving the City of Philadelphia of approximately \$456,725 worth of fees for these reports. In exchange for these unauthorized reports, defendant TINA MARIE MEYRICK gave Layre approximately \$127,883 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

**TINA MARIE MEYRICK**

corruptly gave, offered, and agreed to give a thing of value, that is cash payments totaling approximately \$59,178 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 her with traffic accident reports, police incident reports and fire/EMS reports at a price significantly below the \$211,350 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) and (b), set forth in Count One of this information, defendant

**TINA MARIE MEYRICK**

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:**

  

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**ZANE DAVID MEMEGER**  
United States Attorney