

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MERVIN RHYMES,

Defendant.

INFORMATION

25 Cr.

COUNT ONE
(Conspiracy to Commit Federal Program Bribery)

The Acting United States Attorney charges:

1. From at least in or about January 2020 through at least in or about June 2024, in the Southern District of New York and elsewhere, MERVIN RHYMES, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, federal program bribery, in violation of Title 18, United States Code, Section 666(a)(2).
2. It was a part and object of the conspiracy that MERVIN RHYMES, the defendant, would and did corruptly give, offer, and agree to give a thing of value to a person, being an agent of a local government agency, to wit, the New York City Police Department ("NYPD"), which received in each of the calendar years 2020 through 2024, benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, with the intent to influence and reward that person in connection with business, a transaction, and a series of transactions of the NYPD involving a thing of value of \$5,000 and more, in violation of Title 18, United States Code, Section 666(a)(2), to wit, RHYMES gave, offered, and agreed to give bribes to a co-conspirator ("CC-1"), who, at all relevant times, was a

NYPD traffic safety officer, in exchange for CC-1 providing personally identifiable information of automobile accident victims contained in a non-public NYPD database to RHYMES, who owned and operated a call center that referred accident victims to lawyers and doctors.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed by MERVIN RHYMES, the defendant, and CC-1 in the Southern District of New York and elsewhere:

a. From at least in or about January 2020 through at least in or about June 2024, while at work as an NYPD traffic safety officer, CC-1 reviewed police accident reports ("PARs"), which contained the personally identifiable information of automobile accident victims, for NYPD precincts that were not part of CC-1's law enforcement duties. At times, CC-1 also reviewed PARs while CC-1 was off duty and while on vacation. CC-1 then provided the personally identifiable information of accident victims to RHYMES. For example, in or about April 2024, while at work, CC-1 reviewed PARs and copied and pasted into a Word document the names and phone numbers of automobile accident victims mentioned in the PARs. That same month, CC-1 sent RHYMES dozens of images of documents, each containing dozens of names and phone numbers of automobile accident victims.

b. RHYMES compensated CC-1 for providing the personally identifiable information of automobile accident victims to RHYMES. For example, on or about January 18, 2021, CC-1 told RHYMES, in sum and substance, that CC-1 had sent RHYMES PARs and that RHYMES was supposed to pay CC-1 for the PARs. In response, RHYMES told CC-1 that he had

paid CC-1 for the PARs a few days earlier.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One this Information, MERVIN RHYMES, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.


Substitute Assets Provision

5. If any of the above-described forfeitable property, 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 person;
- 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 subdivided without difficulty;

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

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


MATTHEW PODOLSKY
Acting United States Attorney