

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PAMELA DILLARD,

Defendant.

INFORMATION

25 Cr.

COUNT ONE

(Conspiracy to Commit Federal Program Bribery)

The United States Attorney charges:

1. From at least in or about January 2021 through at least in or about September 2023, in the Southern District of New York and elsewhere, PAMELA DILLARD, 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)(1)(B).

2. It was a part and object of the conspiracy that PAMELA DILLARD, the defendant, 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 2021 through 2023, benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, would and did corruptly solicit and demand for the benefit of a person, and accept and agree to accept, a thing of value from a person, intending to be influenced and rewarded 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)(1)(B), to wit, DILLARD, who, at all relevant times, was a NYPD Principal Police

Communication Technician (“PCT”), solicited and accepted bribes from a co-conspirator (“CC-1”), in exchange for providing personally identifiable information of automobile accident victims contained in a non-public NYPD database to CC-1, 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 PAMELA DILLARD, the defendant, in the Southern District of New York and elsewhere:

a. From at least in or about January 2021 through at least in or about September 2023, while at work as an NYPD Principal PCT, DILLARD accessed the personally identifiable information of automobile accident victims from a non-public NYPD database. DILLARD then provided the personally identifiable information of accident victims to CC-1.

b. CC-1 sent DILLARD bribe payments for providing the personally identifiable information of automobile accident victims to CC-1. Between January 2021 and September 2023, CC-1 sent approximately 21 electronic payments to DILLARD, totaling approximately \$17,300.

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

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One this Information, PAMELA DILLARD, 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.)



JAY CLAYTON
United States Attorney