

3. In May of 1998, Allegheny County voters approved by referendum the adoption of the Allegheny County Home Rule Charter (hereinafter the "Home Rule Charter"). The Home Rule Charter went into effect on January 1, 2000, and stated in its preamble that a "home rule government that holds its officers and employees to high standards of conduct and behavior will enhance public trust in County government."

4. From 2000 through 2005, pursuant to the adoption of the Home Rule Charter, Allegheny County was organized and governed by the provisions of an administrative code promulgated pursuant to the Home Rule Charter (hereinafter the "Administrative Code.") The Coroner was bound by the Administrative Code.

Fiduciary and Ethical Duties of the Coroner

5. From 1996 through 2000, the Second Class County Code required the Coroner to comply with ethics and reporting requirements set forth in 65 Pa.C.S.A. § 1101.1 et seq. (hereinafter the "Pennsylvania State Ethics Code"). In addition, the employment policy promulgated by the Allegheny County Coroner's Office in 2000 provided that all employees of the Allegheny County Coroner's Office were subject to the Pennsylvania State Ethics Code.

6. Sections 1102 and 1103(a) of the Pennsylvania State Ethics Code prohibited the Coroner from using the authority of his

office, or any confidential information received through his holding public office, for his private pecuniary benefit. In addition, Section 1103(d) prohibited the Coroner from accepting any honorarium.

7. The Second Class County Code provided, at 16 P.S. § 4235, that the Coroner could conduct autopsies and other professional services for other counties, but required that any fees collected from other counties for such services be accounted for and paid to the Allegheny County Treasurer.

8. From 2000 through 2005, Section 601.01 of the Administrative Code required that all Independently Elected Officials (including the Coroner) devote a full-time effort to the duties of their offices.

9. From 2000 through 2005, Section 601.04 of the Administrative Code required that all Independently Elected Officials (including the Coroner) abide by the accountability, conduct and ethics code set forth under the Administrative Code, which, *inter alia*, prohibited the Coroner from using county resources for any non-County purpose or for his private financial gain, and required the Coroner to file annual financial disclosure forms.

10. At all times material to this indictment, 16 P.S. § 4233 required the Coroner to exercise the following duties with respect to unclaimed bodies:

Whenever the body of any deceased person who is unidentified, or which body is unclaimed by proper persons, has been found within the county, it shall be removed to the county morgue. The coroner shall, if he deems it necessary, cause any such body to be properly embalmed or prepared for preservation for such length of time as he may think proper. Any such body shall be examined or inspected only by such persons as the coroner authorizes in writing or who are admitted in his presence. No such body shall be removed from any such morgue except upon the certificate of the coroner.

11. At all times material to this indictment, 16 P.S. § 4237 permitted the Coroner to perform an autopsy or order an autopsy on bodies under the jurisdiction of the Allegheny County Coroner's Office only if the Coroner was unable, upon investigation, to determine the cause and manner of death.

The Defendant

12. From 1970 through 1980, and again from 1996 through 2005, defendant CYRIL H. WECHT was the Coroner of Allegheny County. As the Coroner, he was responsible for managing the operations of the Allegheny County Coroner's Office.

13. At all times material to the indictment, defendant CYRIL H. WECHT was prohibited by state and local ethics

requirements from using Allegheny County's resources for his private financial gain.

14. For the years 2001 through 2004, defendant CYRIL H. WECHT was required by his state and local ethical duties to file truthful annual financial disclosure forms.

15. Defendant CYRIL H. WECHT failed to timely file any financial disclosure forms for the years 2001, 2002, and 2003. On or about February 15, 2005, days after local newspapers reported that authorities had "launched a criminal investigation of county Coroner Dr. Cyril H. Wecht for possible violations of state and federal law," defendant CYRIL H. WECHT filed financial disclosure forms for years 2001, 2002, and 2003 for the first time.

16. On or about June 21, 2000, the defendant, CYRIL H. WECHT, filed a declaratory judgment action seeking to declare that the ethics provisions of the Administrative Code did not apply to him as Coroner. On or about December 21, 2001, the Pennsylvania courts ruled that the ethics provisions of the Administrative Code did in fact apply to defendant CYRIL H. WECHT as the Coroner of Allegheny County.

The Defendant's Private Business

17. At all times material to the indictment, Cyril H. Wecht and Pathology Associates, Inc. (hereinafter "Wecht Pathology") was a domestic professional for-profit corporation

registered with the Pennsylvania Department of State and located in Pittsburgh within the Western District of Pennsylvania.

18. At all times material to the indictment, the defendant CYRIL H. WECHT was the sole owner and principal officer of Wecht Pathology.

19. At all times material to the indictment, defendant CYRIL H. WECHT used an outside accounting firm to assist with certain financial matters, including preparation of Wecht Pathology's income tax returns and assistance with management of a pension plan.

20. From 1997 through 2004, while defendant CYRIL H. WECHT was the elected Coroner, Wecht Pathology generated over \$8.75 million in gross income:

a) in 1997, Wecht Pathology reportedly received over \$1,042,955.09 in gross receipts;

b) in 1998, Wecht Pathology reportedly received \$1,059,426 in gross receipts;

c) in 1999, Wecht Pathology reportedly received \$922,438.00 in gross receipts;

d) in 2000, Wecht Pathology reportedly received \$1,090,039.00 in gross receipts;

e) in 2001, Wecht Pathology reportedly received \$1,074,629.00 in gross receipts;

f) in 2002, Wecht Pathology reportedly received \$1,114,236.00 in gross receipts;

g) in 2003, Wecht Pathology reportedly received \$1,245,414.00 in gross receipts;

h) in 2004, Wecht Pathology reportedly received \$1,202,204.00 in gross receipts.

21. From 1997 through 2004, while defendant CYRIL H. WECHT was the elected Coroner, Wecht Pathology paid defendant CYRIL H. WECHT over \$4.65 million in officer compensation:

a) in 1997, Wecht Pathology reportedly paid approximately \$500,000 in officer compensation payments to defendant CYRIL WECHT;

b) in 1998, Wecht Pathology reportedly paid approximately \$600,000 in officer compensation payments to defendant CYRIL WECHT;

c) in 1999, Wecht Pathology reportedly paid approximately \$540,000.00 in officer compensation payments to defendant CYRIL WECHT;

d) in 2000, Wecht Pathology reportedly paid approximately \$623,527.00 in officer compensation payments to defendant CYRIL WECHT;

e) in 2001, Wecht Pathology reportedly paid approximately \$550,000.00 in officer compensation payments to defendant CYRIL WECHT;

f) in 2002, Wecht Pathology reportedly paid approximately \$620,000.00 in officer compensation payments to defendant CYRIL WECHT;

g) in 2003, Wecht Pathology reportedly paid approximately \$664,000.00 in officer compensation payments to defendant CYRIL WECHT;

h) in 2004, Wecht Pathology reportedly paid approximately \$555,000.00 in officer compensation payments to defendant CYRIL WECHT.

22. Defendant CYRIL H. WECHT represented to the Internal Revenue Service that from 1998 through 2004, 100% of his time was devoted to the business of Wecht Pathology.

23. Defendant CYRIL H. WECHT engaged in private income-generating business through Wecht Pathology, including:

a) providing medical-legal forensic pathology opinions, consultations, and expert testimony for private attorneys engaged in civil and criminal litigation in locations throughout the United States and in foreign countries;

b) providing medical-legal forensic pathology opinions, consultations, and expert testimony for public entities

such as legal-aid organizations, district attorney's offices, public defender's offices, and others engaged in civil and criminal litigation;

c) conducting autopsies for counties in Western Pennsylvania, including Armstrong, Clarion, Fayette, Greene, Indiana, and Westmoreland (but not for Allegheny County);

d) conducting autopsies for other clients;

e) speaking at private and public events for honoraria;

f) authoring publications for royalties; and

g) performing in shows at entertainment venues.

COUNTS ONE THROUGH TWENTY-FOUR
THEFT OF HONEST SERVICES - WIRE FRAUD

The Grand Jury further charges that:

24. Paragraphs one through twenty-three of this Indictment are re-alleged and incorporated fully herein by reference.

25. From in and around 1996, and continuing thereafter to in and around 2005, in the Western District of Pennsylvania, the defendant, CYRIL H. WECHT, devised and intended to devise a scheme to defraud, for obtaining money and property, and for depriving another of the intangible right of honest services, by means of breaching his fiduciary and ethical duties as Coroner of Allegheny County and making false and fraudulent pretenses and representations, well knowing at the time that he was breaching his fiduciary and ethical duties and that the pretenses and representations were false and fraudulent when made.

Purpose of the Scheme

26. It was the purpose of the scheme, among other things, to (a) obtain money, property, services and other things of value; (b) violate the fiduciary and ethical duties of defendant CYRIL H. WECHT as Coroner of Allegheny County to Allegheny County and its citizens; and (c) deprive Allegheny County and its citizens of the intangible right to the honest services of defendant CYRIL

H. WECHT as Coroner of Allegheny County and other employees of the Allegheny County Coroner's Office.

The Scheme

27. It was part of the scheme that, from 1996 through 2005, the defendant, CYRIL H. WECHT, used the position, authority, and resources of the Allegheny County Coroner's Office to assist with Wecht Pathology's business activities and thus generate income for Wecht Pathology and himself:

a) Allegheny County Coroner's Office employees were instructed to spend substantial portions of their time while on duty at the Allegheny County Coroner's Office working on private matters to assist with Wecht Pathology's business activities;

b) defendant CYRIL H. WECHT operated a substantial portion of his private consulting business using secretarial, computer, telephone, facsimile, and other general office resources of the Allegheny County Coroner's Office;

c) Wecht Pathology's billing, bookkeeping, client intake, consultation, investigation, research, correspondence, dictation, courier services, scheduling, and other private business activities were conducted at and by the Allegheny County Coroner's Office using Allegheny County Coroner's Office personnel, resources, space, and time;

d) defendant CYRIL H. WECHT personally examined slide tissues and prepared private consulting reports for Wecht

Pathology's private "black lung" cases while at the Allegheny County Coroner's Office;

e) defendant CYRIL H. WECHT caused human brain tissues to be examined and stored at the Allegheny County Coroner's Office for use in private cases for his private financial gain;

f) defendant CYRIL H. WECHT caused on-duty Deputy Coroners to provide courier and transportation services for his private financial gain and in detriment to Allegheny County Coroner's Office business;

g) defendant CYRIL H. WECHT's transportation to and from Pittsburgh International Airport for private business trips was routinely provided by on-duty Deputy Coroners using county-owned vehicles, yet he billed his clients an "airport limousine charge" in connection with these private business trips; Allegheny County paid for the gas and maintenance on the county-owned vehicle used for these trips; nevertheless, defendant CYRIL H. WECHT did not remit the proceeds of his fraudulent "airport limousine charges" to Allegheny County, but retained the proceeds for his own benefit;

h) from in and around June 2003 through in and around December 2005, defendant CYRIL H. WECHT caused Allegheny County cadavers to be provided to Carlow College for use by

students to perform autopsies in cases where autopsies were not permitted by 16 P.S. § 4237;

i) from in and around June 2003 through in and around December 2005, defendant CYRIL H. WECHT caused Allegheny County cadavers to be provided to Carlow College pursuant to an agreement whereby in exchange for those cadavers and other consideration, he obtained the use of a laboratory at Carlow College at which he could engage in his private work;

j) Deputy Coroners were specifically instructed to refer any calls concerning private autopsies to J.M., Wecht Pathology's autopsy technician;

k) vehicles owned by and maintained at the expense of Allegheny County were used extensively to assist with Wecht Pathology's business activities;

l) defendant CYRIL H. WECHT did not pay Allegheny County the proceeds earned through his private business, and did not reimburse Allegheny County for the value of the resources he used.

28. It was further part of the scheme that when defendant CYRIL H. WECHT traveled for private business, he routinely sought and obtained reimbursement for the costs of his travel from his clients; he routinely asked his clients to make the expense reimbursement checks payable to him personally; he

routinely asked that the fee checks be made payable to his business; and he routinely cashed the expense reimbursement checks without depositing the proceeds in his Wecht Pathology account or reporting the reimbursement in the Wecht Pathology books and records. In this manner, he retained the expense reimbursement proceeds for his use as "pocket money," and the expense reimbursement proceeds were concealed from Wecht Pathology's books and records, and thus were also concealed from Wecht Pathology's accountants.

29. It was further part of the scheme that defendant CYRIL H. WECHT routinely submitted false expense reimbursement invoices to his clients. He directed that fake travel agency bills and fake limousine receipts be created to support fraudulent and inflated expense invoices. The travel agency bills were in the name of a defunct travel agency, and they were submitted as support for fraudulently inflated airfare amounts. Defendant submitted the fake limousine receipts to his clients in cases where Deputy Coroners employed by Allegheny County actually provided his transportation in vehicles owned by Allegheny County. The checks defendant CYRIL H. WECHT received as a result of these fake and fraudulent billings were cashed in the manner described in paragraph 28 above, and thereby concealed from Wecht Pathology's

books and records, and thus were also concealed from Wecht Pathology's accountants.

30. It was further part of the scheme that from 1996 through 2005, the defendant, CYRIL H. WECHT, used the position, authority, and resources of the Allegheny County Coroner's Office for the personal and political benefit of himself and his family:

a) Allegheny County Coroner's Office employees were instructed to perform numerous personal errands for defendant CYRIL H. WECHT while on county time, including dog-walking, picking up personal mail, purchasing sporting goods such as tennis balls and nostril swimming plugs, and hauling away rubbish;

b) Allegheny County Coroner's Office employees on county time were instructed to drive defendant CYRIL H. WECHT and members of his family to Pittsburgh International Airport for travel unrelated to Allegheny County Coroner's Office business, including family vacations;

c) Allegheny County Coroner's Office employees on county time were instructed to drive defendant, CYRIL H. WECHT, and members of his family to events and locations unrelated to Allegheny County Coroner's Office business, such as media appearances, theater shows, sporting events, political functions, and other destinations;

d) Defendant CYRIL H. WECHT caused on-duty employees of the Allegheny County Coroner's Office to participate in campaign efforts for his 2000 campaign for the office of Chief Executive of Allegheny County;

e) Defendant CYRIL H. WECHT caused on-duty employees of the Allegheny County Coroner's Office to participate in his son's efforts to win political offices;

f) Defendant CYRIL H. WECHT used and caused to be used Allegheny County resources, including secretarial time, paper, computers, printers, and facsimile machines, to be used to organize political fund-raising activities, solicit financial support for his and his son's campaigns, and berate perceived political critics of him and his son;

g) Defendant CYRIL H. WECHT used and caused to be used Allegheny County secretarial and stationary resources to prepare and mail letters berating opponents of his political endeavors, including a June 15, 2000, letter to Mr. K.H.S. of Pittsburgh, Pennsylvania, on Allegheny County Coroner's Office letterhead typed by K.M., an Allegheny County Coroner's Office employee.

31. It was further part of the scheme that defendant CYRIL H. WECHT used county-owned vehicles to drive outside of

Allegheny County to perform pathology and consulting work in surrounding counties for his private financial gain.

32. It was further part of the scheme that defendant CYRIL H. WECHT billed surrounding counties for whom he did private work a mileage charge on trips where he actually used county-owned vehicles for the travel. Allegheny County paid for the gas and maintenance on the county-owned vehicles he used for these trips.

33. It was further part of the scheme that defendant CYRIL H. WECHT did not remit the said mileage reimbursements to Allegheny County, but rather retained the payments for his private financial gain.

34. It was further part of the scheme that defendant CYRIL H. WECHT made false public statements to conceal his use of the position, authority, and resources of the Allegheny County Coroner's Office for his own financial benefit, including the following false statements made on the television program "Night Talk" on or about February 17, 2005:

Never brought in one single specimen; never requested one single test. I'm saying this now on T.V. with the Chief of Police here: not one urine specimen; not one piece of tissue; nothing from any of these cases. They're all handled privately at Carlow University -- my own autopsy technician, my own secretary doing the typing

* * *

Nothing comes to the lab.

* * *

Do you understand that not one single thing is done in the Allegheny County Coroner's Office pertaining to any of my private work? ... What more can I say?

The Wire Communications

35. On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, CYRIL H. WECHT, for the purpose of executing and attempting to execute the scheme to defraud, did transmit and cause to be transmitted from the Allegheny County Coroner's Office, 542 4th Avenue, Pittsburgh, Pennsylvania, in interstate and foreign commerce, by means of certain writings, signs and signals described below as "material," each such use of the interstate wires being a separate count of this Indictment:

Count	Date	Recipient	Material
1	February 12, 2002	K.C., Annandale, New Jersey	Facsimile of invoice for expenses for a paid speaking engagement
2	April 29, 2002	D.J.G., Esq., Frankfort, Kentucky	Facsimile of fee schedule for private services re B.P.D., deceased
3	June 3, 2002	A.R.S., Esq., Akron, Ohio	Facsimile of invoices for private services re D.H., deceased
4	November 21, 2002	J.B., Springfield, Missouri	Facsimile of executed contract for paid teaching engagement
5	May 22, 2003	Chubb Insurance, New Jersey	Facsimile of invoice for private services re J.W.
6	June 26, 2003	Office of the County Auditor, El Paso, Texas	Facsimile of W-9 Tax Form for use in connection with

			private services re C.C., deceased
7	September 3, 2003	K.L.B., Esq., Cleveland, Ohio	Facsimile of invoice for private services re George T., deceased
8	September 3, 2003	F.E.H., Esq., Miami, Florida	Facsimile of invoice for private services re <i>G. v. Mt. Sinai Medical Center</i>
9	September 3, 2003	D.W., Esq., Denver, Colorado	Facsimile of invoice for private services re V.L.L., deceased
10	September 23, 2003	A.S., Esq., Canton, Ohio	Facsimile of invoice for private services re J.T., deceased
11	September 2003	Mississippi Attorney General's Office, Public Integrity Division	Facsimile of invoice for private services re C.T.B., deceased
12	October 1, 2003	R.M.S., Esq., Ithaca, New York	Facsimile of invoice for private services re M.R.W., deceased
13	October 24, 2003	V.W., Dayton, Ohio	Facsimile of invoice for private services re K.S., deceased
14	October 24, 2003	D.B.C, M.D., J.D., Omaha, Nebraska	Facsimile of invoice for private services re C.T.
15	October 24, 2003	H.C.L., Ph.D., Branford, Connecticut	Facsimile of invoice and request for payment for private services re <i>State of Arizona v. T.S.</i>
16	January 15, 2004	Public Defender for the District of Columbia, Washington, D.C.	Facsimile of invoice for private services re F.B.

17	January 22, 2004	E.A., Esq., Lakeport, California	Facsimile of invoice for private services re C.A.D.
18	May 19, 2004	S.D.C, Esq., Los Angeles California	Facsimile of invoice for private services re C.-F.Y., deceased
19	June 4, 2004	D.E.B., Esq., Reserve, Louisiana	Facsimile of invoice for private services re W.M.A., deceased
20	June 10, 2004	J.F.G., Esq., Akron, Ohio	Facsimile of fee schedule and curriculum vitae for private services re "court-appointed homicide case"
21	July 14, 2004	T.M.E., Esq., Cincinnati, Ohio	Facsimile of invoice for private services re R.M., deceased
22	July 14, 2004	J.G., Esq., Cincinnati, Ohio	Facsimile of invoice for private services re R.M., deceased
23	August 24, 2004	Office of the Federal Public Defender, Nashville, Tennessee	Facsimile of invoice for private services re P.W.
24	February 7, 2005	J.F.L., Bluefield, West Virginia	Facsimile of invoice for private services re K.J., deceased

In violation of Title 18, United States Code, Sections
1343, 1346, and 2.

COUNTS TWENTY-FIVE THROUGH THIRTY-TWO
THEFT OF HONEST SERVICES - MAIL FRAUD

The Grand Jury further charges that:

36. Paragraphs one through twenty-three of this Indictment are re-alleged and incorporated fully herein by reference.

37. From in and around 1996, and continuing thereafter to in and around 2005, in the Western District of Pennsylvania, the defendant, CYRIL H. WECHT, devised and intended to devise a scheme to defraud, for obtaining money and property, and for depriving another of the intangible right of honest services, by means of breaching his fiduciary and ethical duties as Coroner of Allegheny County and making false and fraudulent pretenses and representations, well knowing at the time that he was breaching his fiduciary and ethical duties and that the pretenses and representations were false and fraudulent when made.

Purpose of the Scheme

38. It was the purpose of the scheme, among other things, to (a) obtain money, property, services and other things of value; (b) violate the fiduciary and ethical duties of defendant CYRIL H. WECHT as Coroner of Allegheny County to Allegheny County and its citizens; and (c) deprive Allegheny County and its citizens of the intangible right to the honest services of defendant CYRIL

H. WECHT as Coroner of Allegheny County and other employees of the Allegheny County Coroner's Office.

The Scheme

39. Paragraphs twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference as the description of the scheme to defraud.

The Mailings

40. On or about the dates set forth below, in the Western District of Pennsylvania, the defendant, CYRIL H. WECHT, for the purpose of executing and attempting to execute the scheme to defraud, did knowingly cause to be delivered by United States mail, according to the directions thereon, mail matter identified below, addressed to the addressees identified below, each such use of the United States mail being a separate count of this Indictment:

Count	Date	Addressee	Mail Matter
25	January 29, 2003	M.C.G., Esq., Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides re S.E.D., deceased
26	June, 2003	S.O.R., Esq., Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides re R.B., deceased
27	July, 2003	S.B.E., Esq., Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides re G.B., deceased

28	October, 2003	D.J.R., Esq., Washington, Pennsylvania	Package of Microscopic Autopsy Tissue Slides in "black lung" case re E.J.H., deceased
29	May, 2004	E.H.B., Esq., Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides re R.R., deceased
30	June 10, 2004	E.K., Esq., Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides in "black lung" case re E.L., deceased
31	June, 2004	L.B., MCS, Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides re L.S., deceased
32	June 25, 2004	L.J.P., Pittsburgh, Pennsylvania	Package of Microscopic Autopsy Tissue Slides in "black lung" case re T.J.B., deceased

In violation of Title 18, United States Code, Section
1341, 1346, and 2.

COUNTS THIRTY-THREE THROUGH FORTY-TWO
WIRE FRAUD

The Grand Jury further charges that:

41. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

Purpose of the Scheme

42. From on or about January 1, 1996, and continuing thereafter to on or about December 31, 2005, in the Western District of Pennsylvania and elsewhere, the defendant, CYRIL H. WECHT, devised and intended to devise a scheme to defraud and for obtaining money by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

The Scheme

43. It was part of the scheme to defraud that defendant, CYRIL H. WECHT, caused fake and fraudulent expense reimbursement invoices to be prepared for his clients.

44. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT charged his clients for "limousine service" expenses to and from Pittsburgh International Airport when in truth and in fact defendant CYRIL H. Wecht had traveled to and from Pittsburgh International Airport in vehicles owned by

Allegheny County with the assistance of Deputy Coroners employed by the Allegheny County Coroner's Office.

45. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT caused fake and fraudulent receipts to be created to support his "limousine service" expense charges when in truth and in fact defendant CYRIL H. WECHT had traveled to and from Pittsburgh International Airport in vehicles owned by Allegheny County with the assistance of Deputy Coroners employed by the Allegheny County Coroner's Office.

46. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT charged some clients for airfare expenses significantly in excess of the amounts he actually paid for such airfares.

47. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT caused fake and fraudulent travel agency bills to be created to support his charges to his clients for airfares significantly in excess of the amounts he actually paid for such airfares.

48. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT caused the false expense reimbursement invoices, fake limousine bills, and fake travel agency bills to be transmitted from facsimile machines at the Allegheny County Coroner's Office to his clients in other states.

49. It was further a part of the scheme to defraud that defendant, CYRIL H. WECHT, directed his clients to make checks for his fee payments payable to his business, but asked his clients to pay the fraudulent expense reimbursements with a separate check payable to "Cyril H. Wecht M.D., J.D.".

50. It was further a part of the scheme to defraud that defendant, CYRIL H. WECHT, concealed his fraud from the books and records of Wecht Pathology and from Wecht Pathology's accountants by causing expense reimbursement checks to be cashed at a bank, rather than deposited into his corporate account.

51. It was further a part of the scheme to defraud that defendant, CYRIL H. WECHT, gave false testimony about his expenses under oath at depositions to conceal his fraud.

The Wire Communications

52. On or about the dates set forth below, in the Western District of Pennsylvania and elsewhere, the defendant, CYRIL H. WECHT, for the purpose of executing and attempting to execute the scheme to defraud, did transmit and cause to be transmitted from the Allegheny County Coroner's Office, 542 4th Avenue, Pittsburgh, Pennsylvania, in interstate and foreign commerce, by means of certain writings, signs and signals described below as "material," each such use of the interstate wires being a separate count of this Indictment:

Count	Date	Recipient	Material
33	February 12, 2002	K.C., Esq., Annandale, New Jersey	Facsimile of False Expense Reimbursement Invoice, Fake Travel Agency Bill, and Fake Limousine Receipt
34	June 3, 2002	A.R.S., Esq., Akron, Ohio	Facsimile of False Expense Reimbursement Invoice and Fake Travel Agency Bill
35	June 11, 2002	E.A.B., Esq., Royal Oak, Michigan	Facsimile of False Expense Reimbursement Invoice
36	October 7, 2002	E.E.H., Esq., Raleigh, North Carolina	Facsimile of Fake Limousine Receipt
37	August 21, 2003	M.J.G., Esq., Los Angeles, California	Facsimile of False Expense Reimbursement Invoice
38	September 10, 2003	M.S., Esq., Miami, Florida	Facsimile of False Expense Reimbursement Invoice
39	March 23, 2004	J.H., Esq., Roseland, New Jersey	Facsimile of False Expense Reimbursement Invoice
40	April 20, 2004	P.S.C., Santa Ana, California	Facsimile of False Expense Reimbursement Invoice
41	April 1, 2004	J.E., Esq., Cherry Hill, New Jersey	Facsimile of False Expense Reimbursement

			Invoice
42	March 9, 2005	D.E.B., Esq., Reserve, Louisiana	Facsimile of False Expense Reimbursement Invoice

In violation of Title 18, United States Code, Sections
1343 and 2.

COUNTS FORTY-THREE THROUGH SEVENTY-NINE
MAIL FRAUD

The Grand Jury further charges that:

53. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

Purpose of the Scheme

54. From on or about January 1, 1996, and continuing thereafter to on or about December 31, 2005, in the Western District of Pennsylvania and elsewhere, the defendant, CYRIL H. WECHT, devised and intended to devise a scheme to defraud and for obtaining money by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

The Scheme

55. It was part of the scheme to defraud that defendant, CYRIL H. WECHT, caused fake and fraudulent mileage reimbursement invoices to be prepared and sent to counties in Western Pennsylvania, including Armstrong, Fayette, Greene, and Westmoreland Counties, in connection with his private autopsy and consulting services.

56. It was further part of the scheme that defendant CYRIL H. WECHT billed surrounding counties a mileage charge on

trips where he actually used vehicles owned by Allegheny County for the travel. Allegheny County paid for the gas and maintenance on the county-owned vehicle he used for these trips. Defendant CYRIL H. WECHT did not reimburse Allegheny County for these mileage expenses.

57. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT caused the false mileage reimbursement invoices to be mailed to Armstrong, Fayette, Greene, and Westmoreland Counties.

58. It was a further part of the scheme to defraud that defendant CYRIL H. WECHT requested that the counties mail to him separate checks in payment of the false mileage reimbursement invoices.

59. It was further part of the scheme to defraud that defendant CYRIL H. WECHT instructed K.M., an Allegheny County Coroner's Office employee, to type and send a 2003 letter to a police officer in Greensburg, Pennsylvania, who had issued a parking ticket to the county-owned vehicle driven by the defendant while he testified for personal profit.

The Mailings

60. On or about the dates set forth below, in the Western District of Pennsylvania, the defendant, CYRIL H. WECHT for the purpose of executing and attempting to execute the scheme to defraud, did knowingly cause to be delivered by United States mail, according to the directions thereon, mail matter identified below, addressed to the addressees identified below, each such use of the United States mail being a separate count of this Indictment:

Count	Date	Addressee	Mail Matter
43	January 23, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re P.L.R., deceased
44	February 8, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with additional false mileage reimbursement expense re P.L.R., deceased
45	February 8, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re K.A.T., deceased
46	March 12, 2001	Armstrong County District Attorney's Office, Kittanning, Pennsylvania	Invoice with false mileage reimbursement expense re J.W.H., deceased
		Armstrong County	Invoice with

47	May 10, 2001	District Attorney's Office, Kittanning, Pennsylvania	false mileage reimbursement expense re J.L.D., deceased
48	June 7, 2001	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re G.L.D., deceased
49	June 11, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re L.M.S., deceased
50	July 11, 2001	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re M.E.K., deceased
51	July 13, 2001	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re E.J.P. and K.M.P., deceased
52	October 3, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re L.J.G., deceased
53	October 12, 2001	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re R.D.C., deceased

54	November 9, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re K.M.G., deceased
55	December 6, 2001	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re D.G.J., deceased
56	January 10, 2002	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re W.F.S., deceased
57	February 5, 2002	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re S.S., deceased
58	April 3, 2002	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re L.M.C., deceased
59	April 3, 2002	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re E.P. and K.P., deceased
60	May 8, 2002	Fayette County District Attorney's Office, Uniontown,	Invoice with false mileage reimbursement expense re

		Pennsylvania	G.L.T., deceased
61	May 22, 2002	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re K.J.N., deceased
62	July 18, 2002	Westmoreland County Coroner's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re A.G.W., deceased
63	October 2, 2002	Westmoreland County Coroner's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re C.R., deceased
64	October 31, 2002	Westmoreland County District Attorney's Office, Greensburg, Pennsylvania	Invoice with false mileage reimbursement expense re T.M.G., deceased
65	November 7, 2002	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re Z.J., deceased
66	January 27, 2003	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re M.E., deceased
67	March 11, 2003	Fayette County District Attorney's Office, Uniontown,	Invoice with false mileage reimbursement expense re C.D.S., deceased

		Pennsylvania	
68	April 8, 2003	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re C.K., deceased
69	July 9, 2003	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re T.L.T., deceased
70	July 24, 2003	Greene County District Attorney's Office, Waynesburg, Pennsylvania	Invoice with false mileage reimbursement expense re D.E.C., deceased
71	September 22, 2003	Greene County District Attorney's Office, Waynesburg, Pennsylvania	Invoice with false mileage reimbursement expense re D.M.M., deceased
72	November 11, 2003	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re J.L., deceased
73	March 1, 2004	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re H.E.P., deceased
74	April 22, 2004	Fayette County District Attorney's	Invoice with false mileage reimbursement

		Office, Uniontown, Pennsylvania	expense re J.M.K., deceased
75	May 11, 2004	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re L.A.B. et al.,
76	October 4, 2004	Fayette County Coroner's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re K.R.S., deceased
77	November 3, 2004	Fayette County District Attorney's Office, Uniontown, Pennsylvania	Invoice with false mileage reimbursement expense re J.L. and D.M., deceased
78	November 4, 2004	Armstrong County District Attorney's Office, Kittanning, Pennsylvania	Invoice with false mileage reimbursement expense re K.T., deceased
79	June 2, 2005	Greene County District Attorney's Office, Waynesburg, Pennsylvania	Invoice with false mileage reimbursement expense re E.K.M., deceased

In violation of Title 18, United States Code, Sections
1341 and 2.

COUNT EIGHTY
THEFT CONCERNING ORGANIZATION RECEIVING FEDERAL FUNDS

The grand jury further charges:

61. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

62. During the calendar year 2001, in the Western District of Pennsylvania and elsewhere, Defendant CYRIL H. WECHT, being an agent of Allegheny County, a local government organization that received benefits in excess of \$10,000 during the calendar year 2001 through a variety of federal programs, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to his own use property valued at \$5,000 or more and owned by or under the care, custody, and control of Allegheny County, specifically the use of personnel, vehicles, facilities, resources, equipment, and space of the Allegheny County Coroner's Office used to conduct his private business activities.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT EIGHTY-ONE
THEFT CONCERNING ORGANIZATION RECEIVING FEDERAL FUNDS

The grand jury further charges:

63. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

64. During the calendar year 2002, in the Western District of Pennsylvania and elsewhere, Defendant CYRIL H. WECHT, being an agent of Allegheny County, a local government organization that received benefits in excess of \$10,000 during the calendar year 2002 through a variety of federal programs, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to his own use property valued at \$5,000 or more and owned by or under the care, custody, and control of Allegheny County, specifically the use of personnel, vehicles, facilities, resources, equipment, and space of the Allegheny County Coroner's Office used to conduct his private business activities.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT EIGHTY-TWO
THEFT CONCERNING ORGANIZATION RECEIVING FEDERAL FUNDS

The grand jury further charges:

65. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

66. During the calendar year 2003, in the Western District of Pennsylvania and elsewhere, Defendant CYRIL H. WECHT, being an agent of Allegheny County, a local government organization that received benefits in excess of \$10,000 during the calendar year 2003 through a variety of federal programs, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to his own use property valued at \$5,000 or more and owned by or under the care, custody, and control of Allegheny County, specifically the use of personnel, vehicles, facilities, resources, equipment, and space of the Allegheny County Coroner's Office used to conduct his private business activities.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT EIGHTY-THREE
THEFT CONCERNING ORGANIZATION RECEIVING FEDERAL FUNDS

The grand jury further charges:

67. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

68. During the calendar year 2004, in the Western District of Pennsylvania and elsewhere, Defendant CYRIL H. WECHT, being an agent of Allegheny County, a local government organization that received benefits in excess of \$10,000 during the calendar year 2004 through a variety of federal programs, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to his own use property valued at \$5,000 or more and owned by or under the care, custody, and control of Allegheny County, specifically the use of personnel, vehicles, facilities, resources, equipment, and space of the Allegheny County Coroner's Office used to conduct his private business activities.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

COUNT EIGHTY-FOUR
THEFT CONCERNING ORGANIZATION RECEIVING FEDERAL FUNDS

The grand jury further charges:

69. Paragraphs one through twenty-three and twenty-seven through thirty-four of this Indictment are re-alleged and incorporated fully herein by reference.

70. During the calendar year 2005, in the Western District of Pennsylvania and elsewhere, Defendant CYRIL H. WECHT, being an agent of Allegheny County, a local government organization that received benefits in excess of \$10,000 during the calendar year 2005 through a variety of federal programs, did knowingly embezzle, steal, obtain by fraud and otherwise without authority convert to his own use property valued at \$5,000 or more and owned by or under the care, custody, and control of Allegheny County, specifically the use of personnel, vehicles, facilities, resources, equipment, and space of the Allegheny County Coroner's Office used to conduct his private business activities.

In violation of Title 18, United States Code, Sections 666(a)(1)(A) and 2.

A True Bill,

FOREPERSON

MARY BETH BUCHANAN
United States Attorney
PA ID No. 50254