

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 08-\_\_\_\_\_**  
**v.** : **DATE FILED: August 19, 2008**  
**FRANK J. BROWN** : **VIOLATIONS:**  
: **26 U.S.C. § 7206(2) (aiding or assisting in**  
: **the preparation of false federal income**  
: **tax returns - 59 counts)**  
: **26 U.S.C. § 7206(1)(filing false federal**  
: **income tax return - 2 counts)**

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNTS ONE THROUGH FIFTY-NINE**

At all times material to this indictment:

1. Defendant FRANK J. BROWN was self-employed as a tax preparer, who assisted customers in preparing tax returns for a fee. BROWN's tax preparation business was located at 1130 Parker Street, Chester, Pennsylvania.
2. On the returns that he prepared for his clients, defendant FRANK J. BROWN followed a practice of falsely overstating deductions, such as business expenses and charitable contributions, and including deductions for which there was no basis in fact. In addition, defendant BROWN listed fraudulent investments on the returns of some of his clients. Defendant BROWN also falsely stated the filing status of some of his clients. In making these false statements in the returns he prepared, defendant BROWN intended to reduce the amount of tax owed by the clients and increase any refunds due to the clients.
3. On or about the dates listed below, in the Eastern District of Pennsylvania, defendant

**FRANK J. BROWN**

willfully aided and assisted in, procured, counseled, and advised the preparation and presentation, to the Internal Revenue Service, under or in connection with, matters arising under the internal revenue laws of the United States, of tax returns and other documents which were false or fraudulent as to a material matter as described below:

<b>Count</b>	<b>Taxpayer</b>	<b>Tax Year</b>	<b>Date Return Filed</b>	<b>Falsity</b>
1	J. and R. B.	2001	04/15/2002	charitable contributions, deduction for employee business expenses, and job search costs, union dues, subscriptions
2	J. and R. B.	2002	04/15/2003	charitable contributions, deduction for employee business expenses, and job search costs, union dues, subscriptions
3	J. and R. B.	2003	04/14/2004	charitable contributions, deduction for employee business expenses
4	J. and R. B.	2004	04/14/2005	charitable contributions, deduction for employee business expenses, and job search costs, union dues, subscriptions
5	L.C.	2001	06/12/2002	charitable contributions, job search costs
6	L.C.	2002	06/03/2003	charitable contributions, job search costs
7	L.C.	2003	07/21/2004	charitable contributions, job search costs
8	L.C.	2004	04/15/2005	charitable contributions, job search costs
9	K.C.	2001	04/15/2002	union dues, deduction for employee business expenses, uniforms
10	K.C.	2002	04/15/2003	union dues, deduction for employee business expenses, uniforms
11	K.C.	2003	04/15/2004	union dues, deduction for employee business expenses, uniforms
12	K.C.	2004	04/15/2005	union dues, deduction for employee business expenses, uniforms, job search, small tools

<b>Count</b>	<b>Taxpayer</b>	<b>Tax Year</b>	<b>Date Return Filed</b>	<b>Falsity</b>
13	E. and S. D.	2002	05/21/2003	charitable contributions
14	E. and S. D.	2003	04/15/2004	charitable contributions
15	E. and S. D.	2004	04/15/2005	charitable contributions
16	A. and D. D.	2002	04/15/2003	uniform expenses, job search, travel expenses, daycare expenses
17	A. and D. D.	2003	04/15/2004	uniform expenses, job search, daycare expenses
18	A. and D. D.	2004	04/15/2005	uniform expenses, investment expenses, business travel, daycare expenses
19	A. and D. D.	2005	05/08/2006	uniforms, travel, daycare expenses
20	J. and T. M.	2001	04/15/2002	charitable contributions
21	J. and T. M.	2002	04/15/2003	charitable contributions and meals and entertainment
22	J. and T. M.	2003	04/15/2004	charitable contributions and meals and entertainment, job search expenses
23	J. and T. M.	2004	04/15/2005	charitable contributions and meals and entertainment, job search expenses
24	J. and T. M.	2005	04/15/2006	charitable contributions, job search expenses
25	E. and T. M.	2002	04/15/2003	charitable contributions, deduction for employee business expenses
26	E. and T. M.	2003	04/15/2004	charitable contributions, deduction for employee business expenses
27	E. and T. M.	2004	04/15/2005	charitable contributions, deduction for employee business expenses, union dues
28	K. and B.N.	2002	04/15/2003	claimed as head of household, charitable contributions, employment expenses
29	K. and B.N.	2003	04/15/2004	claimed as head of household, charitable contributions

<b>Count</b>	<b>Taxpayer</b>	<b>Tax Year</b>	<b>Date Return Filed</b>	<b>Falsity</b>
30	K. and B.N.	2004	04/15/2005	claimed as head of household, charitable contributions, uniforms, tools, investment expenses, business travel and meals
31	G. and V. P.	2001	04/29/2002	second job expenses
32	G. and V. P.	2002	05/02/2003	second job expenses
33	G. and V. P.	2003	06/27/2004	second job expenses
34	G. and V. P.	2004	04/15/2005	profit and loss from a business
35	G. and V. P.	2005	04/15/2006	profit and loss from a business
36	V. W. and T. R-W.	2001	06/11/2002	charitable contributions and uniforms
37	V. W. and T. R-W.	2002	04/15/2003	charitable contributions and uniforms
38	V. W. and T. R-W.	2003	04/15/2004	charitable contributions and uniforms
39	V. W. and T. R-W.	2004	04/15/2005	charitable contributions and uniforms
40	F. and G. R.	2001	04/15/2002	charitable contributions and uniforms
41	F. and G. R.	2002	04/15/2003	charitable contributions and uniforms
42	F. and G. R.	2003	04/15/2004	charitable contributions
43	F. and G. R.	2004	04/15/2005	charitable contributions, investment expenses
44	F. and G. R.	2005	04/15/2006	charitable contributions, investment expenses
45	A. and I. R.	2001	04/15/2002	union dues, work clothes
46	A. and I. R.	2002	04/15/2003	union dues, work clothes expenses
47	A. and I. R.	2003	04/15/2004	union dues, work clothes, job search expenses

<b>Count</b>	<b>Taxpayer</b>	<b>Tax Year</b>	<b>Date Return Filed</b>	<b>Falsity</b>
48	A. R.	2004	04/15/2005	union dues, claimed head of household, deduction for employee business expenses
49	W. and J. S.	2003	09/25/2004	union dues, uniform expenses, travel expenses
50	W. and J. S.	2004	04/15/2005	union dues, uniform expenses, travel expenses, deduction for employee business expenses
51	W. and J. S.	2005	04/15/2006	uniforms
52	H. M. and D. W-M.	2003	04/15/2002	uniforms, investment expenses, use of personal vehicle expenses, investment losses
53	H. M. and D. W-M.	2004	04/15/2003	charitable contributions, uniform cost, investment expenses, use of personal vehicle expenses, investment losses
54	H. M. and D. W-M.	2005	04/15/2004	charitable contributions, use of personal vehicle expenses, investment losses
55	B. W.	2001	04/15/2002	claimed head of household
56	B. W.	2002	04/15/2003	claimed head of household
57	B. W.	2003	04/15/2004	claimed head of household
58	B. W.	2004	04/15/2005	claimed head of household
59	UCA	2005	04/15/2006	charitable contributions, uniform expenses, travel expenses, small tools, meals and entertainment

All in violation of Title 26, United States Code, Section 7206(2).

**COUNT SIXTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 15, 2004, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FRANK BROWN**

willfully made and subscribed a United States income tax return, Form 1040 and accompanying schedules, for the calendar year 2003, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, which defendant BROWN did not believe to be true and correct as to every material matter, in that the return reported gross receipts from his tax preparation business of \$2,500 when, as defendant BROWN knew, the gross receipts from his business were at least \$51,639.50.

In violation of Title 26, United States Code, Section 7206(1).

**COUNT SIXTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 15, 2005, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendant

**FRANK BROWN**

willfully made and subscribed a United States income tax return, Form 1040 and accompanying schedules, for the calendar year 2004, which was verified by a written declaration that it was made under the penalty of perjury and filed with the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, which defendant BROWN did not believe to be true and correct as to every material matter, in that the return reported no gross receipts from his tax preparation business, when, as defendant BROWN knew, the gross receipts from his business were at least \$45,300.

In violation of Title 26, United States Code, Section 7206(1).

**A TRUE BILL:**

---

**GRAND JURY FOREPERSON**

---

**LAURIE MAGID**  
**Acting United States Attorney**