

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 10-_____**
v. : **DATE FILED: _____**
PATRICIA BROWN : **VIOLATIONS:**
: **18 U.S.C. § 1343 (wire fraud - 1 count)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this information, defendant PATRICIA BROWN worked as the administrator for the Philadelphia Chapter of the Society for Information Managers (“SIM”). As administrator, she occupied a position of trust at SIM.

THE SCHEME

2. Between in or about November 2005 and in or about September 2009, defendant

PATRICIA BROWN,

using her position at SIM, devised and intended to devise a scheme to defraud SIM to obtain money by means of false and fraudulent pretenses.

MANNER AND MEANS

It was part of the scheme that:

3. Defendant PATRICIA BROWN served as the administrator for SIM and her responsibilities included managing membership applications, collecting dues, organizing meetings, and mailing checks to vendors.

4. Defendant PATRICIA BROWN used her position within SIM to write herself numerous checks for amounts of money that she had not earned and that had not been approved by SIM's treasurer.

5. In order to conceal her scheme to embezzle money from SIM, defendant PATRICIA BROWN created false financial statements that she then sent to SIM's Board of Directors. These false financial statements failed to identify the sums of money defendant BROWN had embezzled and grossly overstated the amount of funds present in SIM's bank and investment accounts.

6. On or about October 6, 2008, in the Eastern District of Pennsylvania, defendant

PATRICIA BROWN,

for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds, that is, an electronic mail message from herself to a SIM official attaching a false financial statement which concealed the fact that she was embezzling funds from SIM.

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1343, set forth in this Information, defendant

PATRICIA BROWN

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses.

2. If any of the property 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;

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

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).


ZANE DAVID MEMEGER
United States Attorney