

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 12-
	:	
v.	:	18 U.S.C. §§ 201(b)(2)(A) and
	:	(C), 981(a)(1)(C) and 18
	:	U.S.C. § 2
JOB BROWN	:	28 U.S.C. § 2461

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Receipt of Bribes

1. At all times relevant to this Information:
  - a. Defendant JOB BROWN (hereinafter "defendant BROWN") was employed by the Federal Bureau of Prisons ("BOP") as a correctional officer at Federal Correctional Institution - Fairton ("FCI-Fairton"). As a correctional officer, defendant BROWN was responsible for supervising inmates while enforcing the regulations governing the operation of FCI-Fairton.
  - b. There was a particular federal inmate assigned to FCI-Fairton ("the Inmate").
  - c. The BOP was an agency of the United States government within the United States Department of Justice responsible for confining federal offenders in the controlled environments of prisons and community-based facilities. FCI-Fairton was a BOP facility located in Cumberland County, New

Jersey.

d. Federal inmates housed at FCI-Fairton were prohibited from possessing contraband in the facility. The FCI Fairton Inmate Information Handbook (the "handbook") specifically defined contraband as any item or thing not authorized or issued by the institution, received through appropriate channels, or purchased through the commissary. The handbook notified inmates that tobacco was considered contraband within the facility. The handbook further notified inmates that they may not possess in excess of 60 First Class U.S. Postage Stamps in FCI-Fairton. Inmates were not authorized to receive vitamins or nutritional supplements through unauthorized channels.

e. Correctional officers employed by the BOP have direct access to the inmates housed at FCI-Fairton and, as part of their lawful duties, are required to ensure that the inmates follow the established rules at FCI-Fairton, including the prohibition against possessing contraband.

2. From in or about January 2012 to on or about March 14, 2012, defendant BROWN accepted approximately \$3,600 in cash payments from an individual acting on behalf of the Inmate ("Intermediary 1") and an undercover law enforcement officer purportedly acting on behalf of the Inmate ("Intermediary 2") in exchange for being influenced in the performance of his official acts and being induced to do and omit to do acts in violation of his official duty as follows:

a. In or about January 2012, defendant BROWN accepted an \$1,100 bribe from Intermediary 1 in exchange for smuggling tobacco into FCI-Fairton on behalf of and for the benefit of the Inmate. Following receipt of this payment, defendant BROWN smuggled tobacco into FCI-Fairton. The tobacco was provided to the Inmate.

b. In or about February 2012, defendant BROWN smuggled tobacco into FCI-Fairton on behalf of and for the benefit of the Inmate. The tobacco was provided to the Inmate.

c. On or about March 14, 2012, defendant BROWN accepted \$2,500 from Intermediary 2, which constituted, in part, the payment for tobacco that defendant BROWN previously had smuggled into FCI-Fairton in February 2012 for the benefit of the Inmate.

d. On or about March 14, 2012, also in exchange for this \$2,500 payment, defendant BROWN smuggled vitamin supplement pills into FCI-Fairton and defendant BROWN provided Intermediary 2 with approximately 900 First Class U.S. Postage Stamps, which defendant BROWN had smuggled out of FCI-Fairton on behalf of the Inmate.

3. From in or about January 2012 to on or about March 14, 2012, in Cumberland County, in the District of New Jersey and elsewhere, defendant

JOB BROWN

being a public official, did directly and indirectly, corruptly

demand, seek, receive, accept and agree to receive and accept money personally, in return for being influenced in the performance of his official acts and being induced to do and omit to do acts in violation of his official duty.

In violation of Title 18, United States Code, Section 201(b) (2) (A) and (C) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

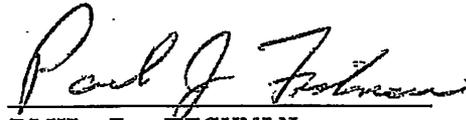
As a result of committing the aforementioned offense in violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C), as alleged in the Information, defendant BROWN shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constituted or was derived from proceeds traceable to the commission of the above offense, including but not limited to, approximately \$3,600 in United States currency, in that such sum constituted or was derived from proceeds traceable to the commission of the above offense.

If any of the above-described forfeitable property, as a result of any act or omission of defendant BROWN:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant BROWN up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Section  
981(a)(1)(C) and Title 28, United States Code, Section 2461.

A handwritten signature in cursive script, reading "Paul J. Fishman". The signature is written in dark ink and is positioned above a horizontal line.

PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

JOB BROWN

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INFORMATION FOR

18 U.S.C. §§ 201(b)(2)(A) and (C),  
981(a)(1)(C) and 18 U.S.C. § 2 and  
28 U.S.C. § 2461

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PAUL J. FISHMAN

*U.S. ATTORNEY NEWARK, NEW JERSEY*

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MATTHEW J. SKAHILL

*Assistant U.S. Attorney*

*Camden, New Jersey*

*(856) 757-5026*

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