

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
 :
 v. : 26 U.S.C. § 7206(1)
 :
 :
 KEITH BROWN : **INFORMATION**
 :

The United States Attorney charges:

COUNT ONE

1. At all times relevant to this Information, defendant KEITH BROWN was a resident of Pilesgrove, New Jersey.
2. At all times relevant to this Information, KEITH BROWN worked as a salesman for Kenal Enterprises, L.L.C. d/b/a Ken Morton Roofing and Siding (“Kenal”), a residential roofing company based in Pitman, New Jersey.
3. From in or around the beginning of 2007 through in or around the end of 2008, KEITH BROWN was paid a ten percent commission on each of the roofing jobs that he sold.
4. From in or around the beginning of 2007 through in or around the end of 2008, KEITH BROWN was paid a portion of his commissions by payroll check, which were reported on Form W-2, Wage and Tax Statement.
5. From in or around the beginning of 2007 through in or around the end of 2008, KEITH BROWN received the majority of his commissions in cash, which were not reported on Form W-2.

6. KEITH BROWN did not report the commissions he received in cash on his 2007 or 2008 U.S. Individual Income Tax Returns, Forms 1040.

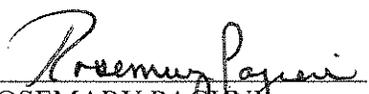
On or about the dates set forth below, in the District of New Jersey and elsewhere, defendant

KEITH BROWN

did willfully make and subscribe a 2007 and 2008 U.S. Individual Income Tax Returns, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which BROWN did not believe to be true and correct as to every material matter. These individual income tax returns, which were filed with the Internal Revenue Service, underreported Brown's total income, as stated on Line 22, whereas, as BROWN then and there knew he received total income substantially in excess of the income he reported, and as stated below:

Year	Approximate Date Form 1040 Filed	Unreported Income
2007	March 20, 2008	\$236,302
2008	March 20, 2009	\$278,453
Total		\$514,755

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


ROSEMARY PAGANI
Chief-Northern Criminal Enforcement Section
Department of Justice - Tax Division