

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 10-
PATRICK BROWN : 26 U.S.C. § 7201

INFORMATION

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

1. At all times relevant to this Information:

A. Defendant PATRICK BROWN was a Roman Catholic priest who was ordained on or about May 18, 1978 and, since that time, has worked in a number of parishes in the Diocese of Paterson. From in or about July 1992 to the present, defendant BROWN was the Pastor of St. Vincent de Paul Parish in Stirling, New Jersey.

B. St. Vincent de Paul Parish served approximately 1,385 families in Stirling and the surrounding communities, and beyond the church itself, included a school, St. Vincent de Paul School, with an enrollment of approximately 281 students in grades pre-kindergarten through 8th, and a cemetery, St. Vincent de Paul Cemetery (St. Vincent de Paul Parish, St. Vincent de Paul School, and St. Vincent de Paul Cemetery collectively referred to herein as “the Parish”).

C. As Pastor and leader of the Parish, defendant BROWN’s duties included, among other things: (1) overseeing the finances of the Parish; (2) reporting annually to the Diocese of Paterson on the finances of the Parish; and (3) participating in Diocese-directed financial reviews.

D. As Pastor, defendant BROWN had near complete control over the finances of the Parish. He alone was authorized to open accounts in the name of the Parish, decide into which accounts donations and other Parish monies were deposited, and determine how those Parish monies were ultimately expended. Defendant BROWN, however, was never authorized to spend Parish monies on personal expenditures unrelated to his Parish duties.

E. As of July 1, 2009, the Diocese paid defendant BROWN approximately \$25,860 per year. Additionally, he was provided with an automobile allowance of approximately \$4,450, a seniority bonus of approximately \$6,200 (\$200 for each year of his 31 years in the priesthood), automobile insurance, and health insurance. His compensation from the Diocese in prior years was similar, albeit with a smaller seniority bonus. In addition to payments from the Diocese, defendant BROWN received income of between approximately \$1,500 and \$6,000 per year from Morris County for serving as Chaplain of the Morris County Jail. He held that position from in or about 1983 to the present.

A. The Chase Account

2. On or about July 9, 1992, just three days after becoming Pastor of the Parish, defendant BROWN opened an account with Chemical Bank, which subsequently merged with JPMorgan Chase Bank. The account was titled, "Rev. Patrick E. Brown St. Vincent DePaul R.C. Church," and bore an account number ending in 0048 (the "Chase Account").

3. The Chase Account was primarily funded with Parish monies, including monies paid by parishioners and others for cemetery plots at St. Vincent de Paul Cemetery, as well as monies paid by parishioners and others for related funeral expenses. Those monies should have been deposited into the Parish's cemetery or perpetual care account. Instead, a

portion of those monies were misdirected by defendant BROWN into the Chase Account.

4. Although the Chase Account remained opened through in or about October 2007, its existence was never disclosed to the Parish or to the Diocese in the Parish's yearly financial disclosures or during any of the Diocese-directed financial reviews of the Parish, which occurred every three years.

5. Between in or about January 2004 and in or about October 2007, defendant BROWN used the Chase Account to fund a number of personal expenditures, including:

- A. Tens of thousands of dollars paid to defendant BROWN himself, as well as his mother, siblings, and other family members as gifts, including for Christmas and birthdays; and
- B. Tens of thousands of dollars paid to the Bank of New York on defendant BROWN's personal credit card. Charges on that credit card included, among other things, several thousand dollars spent on personal vacations in Vail, Colorado, Hawaii, and Ireland.

B. The Sovereign Account

6. On or about November 1, 2007, immediately after closing the Chase Account, defendant BROWN opened an account with Sovereign Bank titled, "Rev. Msgr. Patrick E Brown St. Vincent De Paul Church," and bearing an account number ending in 0739 (the "Sovereign Account").

7. Like the Chase Account, the Sovereign Account was funded, at least in part, with Parish monies, including various donations made to the Parish by parishioners and

others. Those monies should have been deposited into the Parish's operating account, but were instead misdirected by defendant BROWN into the Sovereign Account.

8. Although the Sovereign Account remained opened through in or about June 2009, its existence was never disclosed to the Parish or to the Diocese in the Parish's yearly financial disclosures or during any of the Diocese-directed financial reviews of the Parish, which occurred every three years. Defendant BROWN was the lone individual with signature authority on the Sovereign Account.

9. Between in or about November 2007 and in or about June 2009, defendant BROWN used the Sovereign Account to fund a number of personal expenditures, including:

- A. Work done on his personal residence in Budd Lake, New Jersey;
and
- B. Thousands of dollars paid to Chase Bank on defendant BROWN's personal credit card. Charges on that credit card included, among other things, personal travel to Sun Valley, Idaho.

10. In total, between in or about 2004 and in or about June 2009, defendant BROWN used at least approximately \$63,706.24 in Parish monies from the Chase Account and Sovereign Account for the above-enumerated personal expenditures.

C. The 2005 Tax Return

11. On or about October 28, 2006, defendant BROWN prepared, caused to be prepared, and filed a United States individual income tax return, Form 1040. On that return, he declared a total adjusted gross income of approximately \$30,930. Defendant BROWN signed the return under penalties of perjury, stating, "I have examined this return and accompanying

schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete.”

12. Defendant BROWN intentionally failed to disclose on his 2005 federal income tax return the tens of thousands of dollars in Parish monies he used from the Chase Account and the Sovereign Account for personal expenditures during that year. Likewise, he intentionally failed to disclose the approximately \$6,000 he received from Morris County that year for his work as Chaplain of the Morris County Jail.

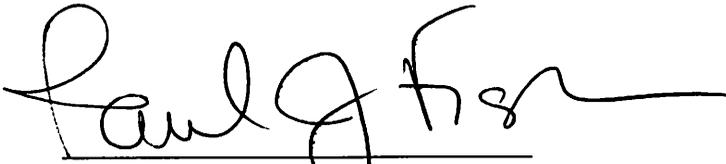
13. Defendant BROWN owed an income tax of approximately \$12,400 on the income described in the preceding paragraph.

14. On or about October 15, 2006, in the District of New Jersey and elsewhere, defendant

PATRICK BROWN

did knowingly and willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year 2005 by, among other things, concealing income from the Internal Revenue Service by using Parish monies he maintained in accounts hidden from both the Parish and Diocese of Paterson for personal expenses, and intentionally failing to pay to the Internal Revenue Service the income tax due on that concealed income.

In violation of Title 26, United States Code, Section 7201.


PAUL J. FISHMAN
United States Attorney