

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No. 10-
BRIAN M. CAMPBELL : Title 18, United States Code,
Sections 981, 982, 1341, 1957,
and 2; Title 28, United States
Code, Section 2461

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges as follows:

COUNTS ONE THROUGH FORTY-SEVEN
(Mail Fraud)

Background

1. At all times relevant to this Indictment:

a. Defendant BRIAN M. CAMPBELL was the Managing
Director and an employee of Pamrapo Service Corporation
(hereinafter the "Service Corporation"), a for-profit company
incorporated in New Jersey that provided securities and
investment services, such as the sale of stocks and bonds, mutual
funds, annuities, various types of insurance policies, and other
money management services, to its clients. The Service
Corporation was a wholly-owned subsidiary of Pamrapo Savings
Bank, S.L.A. (hereinafter the "Bank").

b. The Bank was a Savings and Loan Association
located in Bayonne, New Jersey and a wholly-owned subsidiary of
Pamrapo Bancorp, Inc., a publicly held savings and loan holding

company traded on the NASDAQ Stock Market. The Bank had a board of directors (hereinafter the "Board") that oversaw the operation of the Bank and the Service Corporation and established the compensation schedules of the Service Corporation's employees, including defendant BRIAN M. CAMPBELL.

c. A company headquartered in Poughkeepsie, New York was a publicly traded company that provided accounting services (hereinafter "the Accounting Company"):

(i) A wholly owned subsidiary of the Accounting Company was a Financial Industry Regulatory Authority registered broker/dealer (hereinafter "Subsidiary One"). Subsidiary One contracted with independent registered representatives, including defendant BRIAN M. CAMPBELL, to provide brokerage services for products, such as stocks, bonds, variable mutual funds, and variable life insurance to clients for a fee.

(ii) A wholly owned subsidiary of the Accounting Company was a licensed, registered investment advisory business that managed money for clients for a fee (hereinafter "Subsidiary Two") by and through registered investment advisors, including defendant BRIAN M. CAMPBELL.

d. A company headquartered in Minnesota provided insurance products to customers (hereinafter "Company One"), by and through registered representatives, including defendant BRIAN M. CAMPBELL.

e. A company headquartered in North Carolina provided insurance products to customers (hereinafter "Company Two"), by and through registered representatives, including defendant BRIAN M. CAMPBELL.

f. A company headquartered in Indiana provided insurance products to customers (hereinafter "Company Three"), by and through registered representatives, including defendant BRIAN M. CAMPBELL.

g. A company headquartered in California provided insurance products to customers (hereinafter "Company Four"), by and through registered representatives, including defendant BRIAN M. CAMPBELL.

Relationship Between the Service Corporation and Subsidiary One and Subsidiary Two

2. The Bank established the Service Corporation to facilitate securities and investment services. Because the Service Corporation did not possess any securities licenses, the Service Corporation was required to conduct or "clear" transactions, such as the purchase, sale, and transfer of stocks, through a registered broker-dealer. As such, in or about August 2001, the Service Corporation entered into a contract with

Subsidiary One to act as a broker-dealer on behalf of the Service Corporation and to provide securities brokerage services to the Service Corporation's clients. In a second agreement, in or about August 2001, Subsidiary One and Subsidiary Two entered into a contract with defendant BRIAN M. CAMPBELL, as an employee of the Service Corporation, and designated him as a "registered representative" of Subsidiary One, thereby permitting him to conduct securities transactions for customers on behalf of the Service Corporation.

3. Any commissions or fees generated by defendant BRIAN M. CAMPBELL, as a registered representative of Subsidiary One or a registered investment advisor of Subsidiary Two, constituted property of the Service Corporation and were to be shared by Subsidiary One or Subsidiary Two and the Service Corporation. After the Service Corporation received its portion of the fees and commissions from Subsidiary One or Subsidiary Two, the Service Corporation paid compensation to defendant BRIAN M. CAMPBELL at rates set by the Board.

Relationship Between the Service Corporation and the Insurance Companies

4. The Service Corporation also offered insurance products, including variable insurance and annuity products, by and through insurance companies, including Company One, Company Two, Company Three, and Company Four (hereinafter collectively the "Insurance Companies"). Any commissions or fees generated

through these insurance products constituted property of the Service Corporation and were to be shared by the Insurance Companies and the Service Corporation. After the Service Corporation received its portion of the fees and commissions from the Insurance Companies, the Service Corporation paid compensation to defendant BRIAN M. CAMPBELL at rates set by the Board.

Defendant BRIAN M. CAMPBELL's Pay Cut

5. In or about August 2006, defendant BRIAN M. CAMPBELL's compensation was modified, resulting in defendant BRIAN M. CAMPBELL receiving a significant pay cut.

The Scheme to Defraud

6. From in or about early 2007 through in or about January 2008, defendant BRIAN M. CAMPBELL knowingly and intentionally devised and intended to devise a scheme and artifice to defraud the Service Corporation and the Bank and to obtain money and property from the Service Corporation and the Bank by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice is set forth in substance in Paragraphs 7 through 11 below of this Indictment. In total, through his scheme to defraud, defendant BRIAN M. CAMPBELL wrongfully diverted in excess of \$681,000 in money belonging to the Service Corporation and the Bank to himself.

Means and Methods of the Scheme

7. It was part of the scheme and artifice that defendant BRIAN M. CAMPBELL, in early 2007, began to directly divert to himself fees and commissions paid by Subsidiary One, Subsidiary Two, and the Insurance Companies that were due and owing to the Service Corporation.

Subsidiaries One and Two

8. It was further part of the scheme and artifice that defendant BRIAN M. CAMPBELL instructed Subsidiary One and Subsidiary Two to pay the vast majority of the fees and commissions, which monies were due and owing to the Service Corporation, directly to him. Without the authorization or knowledge of the Board, defendant BRIAN M. CAMPBELL signed and caused to be submitted a letter to Subsidiary One, falsely claiming that the Bank wanted commissions, due and owing to the Service Corporation, to be paid directly to defendant BRIAN M. CAMPBELL.

9. It was further part of the scheme and artifice that defendant BRIAN M. CAMPBELL, on or about July 25, 2007, without the authorization of the Board, caused a letter to be signed that directed Subsidiary One and Subsidiary Two to pay the vast majority of the fees and commissions, due and owing to the Service Corporation, directly to defendant BRIAN M. CAMPBELL.

The Insurance Companies

10. It was further part of the scheme and artifice that defendant BRIAN M. CAMPBELL, in or about early 2007, without the authorization or knowledge of the Board, caused the Insurance Companies to issue fees and commissions, due and owing to the Service Corporation, directly to defendant BRIAN M. CAMPBELL.

Concealment of the Scheme

11. It was further part of the scheme and artifice that defendant BRIAN M. CAMPBELL made and caused to be made materially false and fraudulent statements and concealed material facts from the Bank, its Chief Financial Officer, the Board, the Service Corporation, and others, to cover up and conceal his scheme and to allow it to continue.

The Charges

12. On or about the dates set forth below, in Hudson County, New Jersey, in the District of New Jersey and elsewhere, for the purpose of executing and attempting to execute the scheme and artifice set forth above in Paragraphs 6 through 11, defendant

BRIAN M. CAMPBELL

knowingly placed in post offices and authorized depositories for mail matter, certain matters and things to be sent and delivered by the U.S. Postal Service, and deposited and caused to be deposited certain matters and things to be sent and delivered by private and commercial interstate carriers, and took and received therefrom, certain matters and things, and caused to be delivered by mail and private and commercial interstate carriers according to the direction thereon, that is, checks, each constituting the payment of fees and commissions paid to BRIAN M. CAMPBELL from Subsidiary One, Subsidiary Two, and the Insurance Companies, and mailed on the following dates and in the following amounts:

Count	Payor	Check Date & Approximate Date of Mailing	Approximate Amount of the Check
ONE	Company One	March 25, 2007	\$5,933.22
TWO	Company One	April 1, 2007	\$11,951.52
THREE	Subsidiary Two	August 20, 2007	\$29,803.89
FOUR	Subsidiary One	August 20, 2007	\$396.80
FIVE	Subsidiary Two	September 19, 2007	\$28,674.66

Count	Payor	Check Date & Approximate Date of Mailing	Approximate Amount of the Check
SIX	Company Two	September 28, 2007	\$2,500.00
SEVEN	Subsidiary Two	October 18, 2007	\$38,925.51
EIGHT	Subsidiary Two	November 20, 2007	\$29,509.76
NINE	Company Three	December 6, 2007	\$28,730.01
TEN	Subsidiary Two	December 19, 2007	\$29,645.09
ELEVEN	Subsidiary Two	January 18, 2008	\$31,267.96
TWELVE	Subsidiary Two	February 5, 2008	\$7,680.12
THIRTEEN	Subsidiary One	February 5, 2008	\$423.22
FOURTEEN	Subsidiary Two	February 21, 2008	\$31,952.56
FIFTEEN	Subsidiary Two	March 19, 2008	\$26,775.36
SIXTEEN	Subsidiary Two	April 18, 2008	\$35,013.57
SEVENTEEN	Subsidiary Two	May 5, 2008	\$588.12
EIGHTEEN	Company Two	May 16, 2008	\$1,800
NINETEEN	Subsidiary Two	May 20, 2008	\$28,707.72
TWENTY	Subsidiary Two	June 18, 2008	\$26,899.06
TWENTY-ONE	Company Two	July 18, 2008	\$2,500.00
TWENTY-TWO	Subsidiary Two	July 18, 2008	\$33,356.78
TWENTY-THREE	Subsidiary One	August 5, 2008	\$428.78
TWENTY-FOUR	Subsidiary Two	August 20, 2008	\$28,793.67
TWENTY-FIVE	Subsidiary Two	September 18, 2008	\$24,638.32
TWENTY-SIX	Subsidiary Two	October 20, 2008	\$24,877.20
TWENTY-SEVEN	Subsidiary One	October 20, 2008	\$458.88

Count	Payor	Check Date & Approximate Date of Mailing	Approximate Amount of the Check
TWENTY-EIGHT	Subsidiary Two	November 5, 2008	\$6,216.01
TWENTY-NINE	Subsidiary One	November 5, 2008	\$282.76
THIRTY	Subsidiary Two	November 19, 2008	\$25,370.50
THIRTY-ONE	Company One	November 23, 2008	\$2,643.23
THIRTY-TWO	Subsidiary One	December 3, 2008	\$664.00
THIRTY-THREE	Company One	December 12, 2008	\$1,644.11
THIRTY-FOUR	Company Two	December 13, 2008	\$20,000.00
THIRTY-FIVE	Subsidiary Two	December 18, 2008	\$20,338.36
THIRTY-SIX	Subsidiary One	December 18, 2008	\$297.02
THIRTY-SEVEN	Company Four	December 22, 2008	\$15,448.65
THIRTY-EIGHT	Company Two	December 27, 2008	\$3,200.00
THIRTY-NINE	Subsidiary One	January 6, 2009	\$914.68
FORTY	Subsidiary Two	January 21, 2009	\$21,890.11
FORTY-ONE	Subsidiary One	January 21, 2009	\$16,586.60
FORTY-TWO	Company One	January 25, 2009	\$8,764.69
FORTY-THREE	Subsidiary Two	February 4, 2009	\$2,047.80
FORTY-FOUR	Company Four	February 12, 2009	\$836.36

Count	Payor	Check Date & Approximate Date of Mailing	Approximate Amount of the Check
FORTY-FIVE	Company Four	March 12, 2009	\$4,335.57
FORTY-SIX	Subsidiary Two	March 18, 2009	\$17,362.27
FORTY-SEVEN	Subsidiary One	April 3, 2009	\$327.72

In violation of Title 18, United States Code, Section 1341 and Section 2.

COUNTS FORTY-EIGHT THROUGH FIFTY-FOUR
(Money Laundering)

1. The allegations set forth in Paragraphs 1 through 12 of Counts One through Forty-Seven of this Indictment are hereby realleged as if fully set forth herein.

2. At all times relevant to this Indictment, defendant BRIAN M. CAMPBELL maintained at least two individual checking accounts at the Bank (hereinafter "Account One" and "Account Two"), and he was a signatory on each account.

3. On or about the dates listed below, in Hudson County, in the District of New Jersey and elsewhere, defendant

BRIAN M. CAMPBELL

knowingly engaged and attempted to engage in monetary transactions in criminally derived property of a value greater than \$10,000, as described below, such property having been derived from a specified unlawful activity, namely, mail fraud, in violation of Title 18, United States Code, Section 1341, as follows:

Count	Date of Transaction	Description of Transaction
FORTY-EIGHT	September 10, 2007	An electronic payment in the amount of approximately \$12,000 from Account One to American Express
FORTY-NINE	November 23, 2007	A check in the amount of approximately \$12,000, drawn on Account One and issued to American Express

Count	Date of Transaction	Description of Transaction
FIFTY	December 24, 2007	An electronic payment in the amount of approximately \$10,500 from Account Two to American Express
FIFTY-ONE	January 28, 2008	A check in the amount of approximately \$16,500, drawn on Account Two and issued to American Express
FIFTY-TWO	February 28, 2008	A check in the amount of approximately \$16,500, drawn on Account Two and issued to American Express
FIFTY-THREE	May 27, 2008	A check in the amount of approximately \$11,000, drawn on Account Two and issued to American Express
FIFTY-FOUR	December 26, 2008	An electronic payment in the amount of approximately \$11,700 from Account Two to American Express

All in violation of Title 18, United States Code,
Section 1957(a) and Section 2.

FORFEITURE ALLEGATION

1. The allegations set forth in Paragraphs 1 through 12 of Counts One through Forty-Seven and Paragraphs 2 and 3 of Counts Forty-Eight through Fifty-Four of this Indictment are hereby realleged as if fully set forth herein for the purpose of alleging forfeiture to the United States of America of property in which defendant BRIAN M. CAMPBELL has an interest.

2. Mail Fraud Forfeiture. Upon conviction of any of the offenses alleged in Counts One through Forty-Seven of this Indictment (hereinafter the "Mail Fraud Counts"), defendant BRIAN M. CAMPBELL shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to said offense(s).

3. Money Laundering Forfeiture. Upon conviction of any of the offenses alleged in Counts Forty-Eight through Fifty-Four of this Indictment (hereinafter the "Money Laundering Counts"), defendant BRIAN M. CAMPBELL shall forfeit to the United States any property, real or personal, involved in such offense or any property traceable to such property.

4. Substitute Asset

If any of the above-described forfeitable property, as a result of any act or omission of defendant Brian M. Campbell:

a. cannot be located upon the exercise of due diligence;

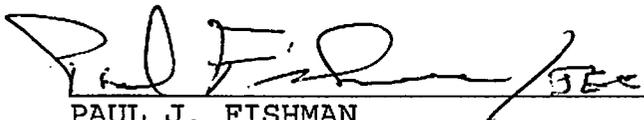
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

All pursuant to Title 18, United States Code, Section 981(a) (1) (C) made applicable hereto by Title 28, United States Code, Section 2461; Title 18, United States Code, Section 982(a) (1) and (b) (2) and the procedures outlined at Title 21, United States Code Section 853, and set forth in Fed. R. Crim. P. 32.2.

A TRUE BILL,

FOREPERSON



PAUL J. FISHMAN
United States Attorney



JAMES MEADE, Acting Chief
Asset Forfeiture and Money
Laundering Section
U.S. Department of Justice
Criminal Division

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

BRIAN M. CAMPBELL

INDICTMENT FOR

Title 18, United States Code, Section 981, 982, 1341, 1957, and 2
Title 28, United States Code, Section 2461

A True Bill,

Foreperson

PAUL J. FISHMAN

*U.S. ATTORNEY
NEWARK, NEW JERSEY*

JAMES MEADE

*ACTING CHIEF, ASSET FORFEITURE AND MONEY LAUNDERING SECTION,
U.S. DEPARTMENT OF JUSTICE, WASHINGTON, D.C.*

ANTHONY MOSCATO
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