

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	
	:	Crim. No. 14-
v.	:	
	:	26 U.S.C. § 7201
JOHN TWOMEY BOOTH	:	

**INFORMATION**

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

**COUNTS 1 to 4**

**(Tax Evasion)**

1. At all times relevant to Counts 1 to 4 of this Information:

A. Defendant JOHN TWOMEY BOOTH (“defendant BOOTH”) was a financial consultant who operated in Hoboken, New Jersey and elsewhere. Defendant BOOTH was the principal of at least four entities that served as the depository for payments made to defendant BOOTH (collectively, the “Booth Entities”).

B. There was an insurance broker based in Towson, Maryland, who specialized in providing insurance brokerage services for public entities, including municipalities and school boards (the “Insurance Broker”). Through entities under his control, the Insurance Broker obtained yearly insurance brokerage contracts with, and provided insurance brokerage services for, numerous New Jersey local government entities, including the Weehawken Board of Education and the Union City Board of Education. The Insurance Broker’s entities were paid commissions from their representations of these New Jersey local government entities.

C. Defendant BOOTH and the Insurance Broker had an arrangement in which defendant BOOTH assisted the Insurance Broker in obtaining the yearly insurance brokerage contracts for certain New Jersey local government entities located in Hudson County, New Jersey, including, among others, the Weehawken Board of Education and the Union City Board of Education. In return for defendant BOOTH's assistance, the Insurance Broker compensated defendant BOOTH, notwithstanding defendant BOOTH's lack of license to operate as an insurance producer in the State of New Jersey.

2. From in or about March 2006 to in or about December 2009, defendant BOOTH accepted hundreds of thousands of dollars in commission payments from the Insurance Broker through the Booth Entities.

3. It was part of the tax evasion scheme that defendant BOOTH received compensation from the Insurance Broker through payments made by the Insurance Broker's entities to the Booth Entities as directed by defendant BOOTH, in order to conceal such income and purposely evade the assessment by the Internal Revenue Service ("IRS") of federal income tax owing on such compensation. Specifically, as set forth in the chart below, from in or about 2006 to in or about 2009, the Insurance Broker, through his various entities, made payments totaling approximately \$273,358 to the Booth Entities:

YEAR	APPROXIMATE AMOUNT OF PAYMENTS FROM THE INSURANCE BROKER TO THE BOOTH ENTITIES
2006	\$20,352
2007	\$79,622
2008	\$75,684
2009	\$97,700
<b>TOTAL</b>	<b>\$273,358</b>

4. In addition to the compensation that defendant BOOTH received from the Insurance Broker, defendant BOOTH—through the Booth Entities—received additional compensation from other sources in 2006 (approximately \$136,000), 2007 (approximately \$181,755), 2008 (approximately \$74,476), and 2009 (approximately \$53,903), totaling approximately \$446,134.

5. From in or about 2006 to in or about 2009, defendant BOOTH used these funds to pay his personal expenses, including, among other things, rent for his apartments, utility bills for his apartments, medical expenses, legal fees, and membership dues for a club to which defendant BOOTH belonged. Defendant BOOTH also withdrew cash from the bank accounts of the Booth Entities.

6. Having received this income, defendant BOOTH was required by law, following the close of each calendar year and on or before the deadline for filing personal income tax returns (IRS Forms 1040), to make and file an income tax return to the IRS stating specifically the items of his gross income and any deductions and credits to which he was entitled.

7. Defendant BOOTH purposely failed to report the payments specified above in paragraphs 3 and 4 on his U.S. Individual Tax Returns (IRS Forms 1040) that defendant BOOTH filed with the IRS for tax years 2006, 2007, and 2008, and therefore, caused false tax returns to be filed with the IRS.

8. Defendant BOOTH also purposely failed to file a U.S. Individual Income Tax Return (IRS Form 1040) for tax year 2009, thereby failing to report as income the payments that he received from the Insurance Broker, as well as the additional income that defendant BOOTH received.

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

JOHN TWOMEY BOOTH

did knowingly and willfully attempt to evade and defeat a substantial tax due and owing by him to the IRS for the tax years set forth below by causing payments to be made by the Insurance Broker and others to the Booth Entities for defendant BOOTH's benefit, by using the funds deposited in the bank accounts of the Booth Entities to pay for his personal expenses and to withdraw cash, by filing false and fraudulent U.S. Individual Income Tax Returns, IRS Forms 1040 with the IRS for tax years 2006, 2007, and 2008 that did not report these payments in the total amounts set forth below, and by failing to file a U.S. Individual Income Tax Return, IRS Form 1040 for tax year 2009:

COUNT	RETURN & TAX YEAR	APPROXIMATE UNREPORTED INCOME	APPROXIMATE TAX DEFICIENCY	DATE OF OFFENSE
1	IRS Form 1040—2006	\$156,352	\$20,418	05/26/2009
2	IRS Form 1040—2007	\$261,377	\$39,041	10/28/2008
3	IRS Form 1040—2008	\$150,160	\$42,218	10/21/2009
4	IRS Form 1040—2009	\$151,603	\$18,055	4/15/2010

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

*Paul J. Fishman/rah*

PAUL J. FISHMAN  
UNITED STATES ATTORNEY

CASE NUMBER: 14-

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

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UNITED STATES OF AMERICA

v.

JOHN TWOMEY BOOTH

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**INFORMATION FOR**

26 U.S.C. § 7201

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**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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