

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- - - - - x

UNITED STATES OF AMERICA : INFORMATION
- v. - : 10 Cr.
MARIE E. THORNTON, :
Defendant. :
- - - - - x

COUNT ONE

The United States Attorney charges:

1. From in or about 1999, up to and including in or about May 2009, in the Southern District of New York and elsewhere, MARIE E. THORNTON, the defendant, being an agent of an organization that received, in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, to wit, Iona College, did embezzle, steal, and obtain by fraud, and did otherwise without authority knowingly convert to the use of a person other than the rightful owner and intentionally misapply, property that was valued at \$5,000 and more and that was owned by and was under the care, custody, and control of such organization, to wit, THORNTON caused more than \$1,200,000 belonging to Iona College to be diverted to her personal use by, among other things, submitting false vendor invoices for reimbursement to Iona College and submitting credit card bills for personal expenses to be paid by

Iona College.

(Title 18, United States Code, Section 666(a)(1)(A).)

FORFEITURE ALLEGATION

2. As a result of committing the embezzlement offense alleged in Count One of this Information, MARIE E. THORNTON, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including, but not limited to, a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

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

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(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 subdivided 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 said
defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981 and
Title 28, United States Code, Section 2461.)

PREET BHARARA
United States Attorney