

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
 v.)
)
)
 MARIE GREANY,)
 Defendant.)

14cr10061
CRIMINAL NO.

VIOLATIONS:

18 U.S.C. § 1343 (Wire Fraud)

18 U.S.C. § 981 & 28 U.S.C. § 2461

(Forfeiture)

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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INFORMATION

The United States Attorney charges that:

At all times relevant to this Information:

1. Company A and Company B were computer systems design and consulting businesses established by the same individual and headquartered in Middleboro, Massachusetts.
2. Defendant Marie Greany was an individual who resided in Mattapoisett, Massachusetts, and who was employed at various times as bookkeeper for both Company A and Company B.

THE SCHEME TO DEFRAUD

3. Beginning in or about January 2006 and continuing to in or about September 2012, GREANY engaged in a scheme to defraud and to obtain money and property of Company A and Company B.
4. As part of the scheme, GREANY used a Company A corporate credit card issued to her to make numerous unauthorized charges for personal expenses, including travel, tickets to various sporting events and theater productions, restaurant meals, and tuition, as well as the costs

for operating her photography business. GREANY then caused these charges to be paid with corporate funds of both Company A and Company B.

5. GREANY also caused wire or electronic transfers of funds from bank accounts of Company A and Company B to pay GREANY'S American Express credit card bills.

6. GREANY also caused the payroll processing company for Company A and Company B to issue payments to her as reimbursement for expenses which had in fact been incurred by other employees as well as for increased salary payments to which she was not entitled.

7. Finally, GREANY wrote two unauthorized checks on Company A's bank account which she used for her own purposes.

8. As a result of her scheme to defraud, GREANY improperly obtained about \$319,322.99 in money and property of Company A and Company B.

COUNT ONE
(Wire Fraud – 18 U.S.C. § 1343)

9. The United States Attorney re-alleges and incorporates by reference paragraphs 1 through 8 of this Information and further charges that:

10. On or about September 1, 2011, in the District of Massachusetts and elsewhere, the defendant,

MARIE GREANY,

having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice, transmitted and caused to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures, and sounds, to wit: wire transfers, electronic funds transfers, associated on-line inquiries and other communications regarding the transfer of \$3,962.41 from Company B Citizens Bank account no. x732-0 to GREANY's American Express credit card account.

All in violation of Title 18, United States Code, Sections 1343 and 2.

FRAUD FORFEITURE ALLEGATIONS
18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

11. Upon conviction of the offense in violation of 18 U.S.C. §1343 as alleged in this Information, the defendant,

MARIE GREANY,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

12. If any of the property described in paragraph 11 above, as a result of any act or omission of the defendant --

- 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 this 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 intention of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property described in subparagraphs a through e of this paragraph.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461(c).

Respectfully submitted,

CARMEN ORTIZ
United States Attorney

By:
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ASSISTANT U.S. ATTORNEY