



COUNT ONE  
(Theft from an Indian Tribal Organization)

3. From in or about January 2005 through in or about June 2008, in the District of Connecticut, THOMAS, being an employee of the MPTN, an Indian tribal organization, did embezzle, steal, convert to his own use, willfully misapply and willfully permit to be misapplied moneys, funds and credits, the value of which was over \$1,000, belonging to the MPTN.

All in violation of 18 U.S.C. § 1163.

COUNT TWO  
(Theft Concerning an Indian Tribal Government Receiving Federal Funds)

4. From on or about January 6, 2007 through on or about January 5, 2008, in the District of Connecticut, THOMAS, being an agent of the MPTN Department of Natural Resources Protection, an agency of an Indian tribal government receiving in the one year period beginning January 6, 2007 benefits in excess of \$10,000 under grants awarded by the United States Department of Interior, did embezzle, steal, obtain by fraud, intentionally misapply, and otherwise without authority knowingly convert to his own use property and funds valued at \$5,000 or more, which property and funds were owned by and under the care, custody and control of the MPTN Department of Natural Resources Protection.

All in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT THREE  
(Theft Concerning an Indian Tribal Government Receiving Federal Funds)

5. From on or about January 6, 2008 through on or about January 5, 2009, in the District of Connecticut, THOMAS, being an agent of the MPTN Department of Natural Resources Protection, an agency of an Indian tribal government receiving in the one year period beginning January 6, 2008 benefits in excess of \$10,000 under grants awarded by the United

States Department of Interior, did embezzle, steal, obtain by fraud, intentionally misapply, and otherwise without authority knowingly convert to his own use property and funds valued at \$5,000 or more, which property and funds were owned by and under the care, custody and control of the MPTN Department of Natural Resources Protection.

All in violation of 18 U.S.C. § 666(a)(1)(A).

FORFEITURE ALLEGATION UNDER 18 U.S.C. § 982(a)

6. Upon conviction of the offenses set forth in Counts 1 through 3 of this Indictment, THOMAS shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(3), any property, real or personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, as a result of such violation, including but not limited to:

Money Judgment:

Approximately \$739,743.64, which represents a sum of money equal to the total amount of proceeds traceable to the violations alleged in Counts 1 through 3 of this Indictment.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence, has been transferred, sold to, or deposited with a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, it is the intent 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 said defendant up to the value of the forfeitable property described above.

All pursuant to 18 U.S.C. § 982(a)(3) and 28 U.S.C. § 2461(c).

A TRUE BILL

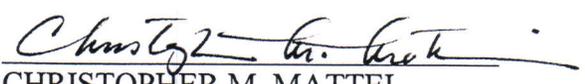
*151*

FOREPERSON

UNITED STATES OF AMERICA



\_\_\_\_\_  
DAVID B. FEIN  
UNITED STATES ATTORNEY



\_\_\_\_\_  
CHRISTOPHER M. MATTEI  
ASSISTANT UNITED STATES ATTORNEY