

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 12-
 :
 v. : 18 U.S.C. § 666(a)(1)(A)
 :
 DIANE BOWLER :

INFORMATION

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

The Defendant

1. At all times relevant to this Information:

a. Defendant DIANE BOWLER (hereinafter “defendant BOWLER”)

was a resident of Gloucester County, New Jersey and was employed by Prism Career Institute (“Prism”). Prism was a private post-secondary educational institution with campuses in Cherry Hill, New Jersey and Egg Harbor Township, New Jersey, as well as in Pennsylvania. Prism was owned and operated by Prism Education Group, Inc. Prism maintained a corporate headquarters in Cherry Hill, New Jersey.

b. Defendant BOWLER was a Regional Vice President at Prism.

Defendant BOWLER’s responsibilities included, among other things, assisting the President and Chief Executive Officer (“CEO”) in policy development and implementation, facilitating interaction and communication between school staff and administration, and serving as a liaison between Prism’s corporate office and Prism’s campuses. Defendant BOWLER’s responsibilities also included the purchase of certain new equipment and services for use by Prism, within Prism’s rules and guidelines.

Prism Career Institute and the Federal Programs

c. The United States Department of Education (“DOE”) was an agency of the United States that provided funds to post secondary educational institutions for educational objectives.

d. Prism received annual benefits from the DOE in excess of \$10,000 for each calendar year from 2008 through 2011 pursuant to numerous federal assistance programs, including Federal Pell Grants, Federal Direct Student Loan Programs, Federal Direct PLUS Loans, and Federal Supplemental Education Opportunity Grants.

Theft from Organization Receiving Federal Benefits

2. Defendant BOWLER, as an executive level employee of Prism, was authorized within Prism’s rules and guidelines to make authorized purchases on behalf of Prism with her personal credit cards and then submit the receipts of these purchases to Prism for reimbursement from Prism.

3. From in or about January 2008 to on or about March 30, 2011, defendant BOWLER used her position within Prism to divert between \$400,000 and \$1,000,000, including more than \$5,000 each year, from Prism in connection with reimbursements as follows:

a. Defendant BOWLER submitted fraudulent reimbursement requests for purchases of supplies, furniture, equipment and other items that were never received by Prism.

b. Defendant BOWLER created falsified invoices in support of these fraudulent reimbursement requests by, among other things, cutting and pasting new dates and invoice numbers onto prior receipts for purchases and by fraudulently creating invoices for

certain vendors with which Prism no longer did business.

c. Defendant BOWLER generated checks payable to herself and forged the CEO of Prism's signature on the checks.

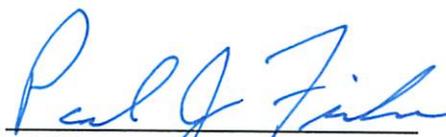
d. Defendant BOWLER received the diverted funds from Prism into her personal bank account.

4. From in or about January 2008 to on or about March 30, 2011, in Camden County, in the District of New Jersey and elsewhere, defendant

DIANE BOWLER

being an agent of Prism, did knowingly embezzle, steal, obtain by fraud, and otherwise without authority convert to her own use, and intentionally misapply \$5,000 and more owned by and under the care, custody, and control of Prism.

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


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA
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INFORMATION FOR

18 U.S.C. § 666(a)(1)(A)

PAUL J. FISHMAN
U.S. ATTORNEY NEWARK, NEW JERSEY

MATTHEW J. SKAHILL
*Assistant U.S. Attorney
Camden, New Jersey
(856) 757-5026*
