UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 25cr10389
	)	
v.	)	Violations:
	)	
WIGENIE FRANCOIS,	)	Count One: Wire Fraud; Aiding and Abetting (18 U.S.C. §§ 1343 and 2)
	)	
Defendant	)	Wire Fraud Forfeiture Allegation: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))
	)	

INFORMATION

At all times relevant to this Information:

General Allegations

A. Relevant Individuals and Entities

1. Defendant, WIGENIE FRANCOIS ("FRANCOIS") was a resident of Brockton, Massachusetts.

2. From 2007 through the present, FRANCOIS was a full-time employee of the United States Department of Veterans Affairs ("VA") working as part of the Nursing Service.

B. CARES Act Unemployment Benefits

3. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in March 2020 and designed to provide emergency financial assistance to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of forgivable loans to small businesses for job retention and certain other expenses, through the Paycheck Protection Program ("PPP").

4. To obtain a PPP loan, a qualifying business was required to submit a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) was required to state, among other things, its gross annual income. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, businesses applying for a PPP loan were required to provide documentation showing their gross income.

5. A PPP loan application was processed by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were guaranteed by the SBA. Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA in the course of processing the loan. This information was material to the participating lender and the SBA with respect to their respective decisions to fund and approve the PPP loan.

6. PPP loan proceeds were required to be used on certain permissible expenses, including payroll costs, mortgage interest, rent, and utilities. Under the applicable PPP rules and guidance, the interest and principal on the PPP loan is eligible for forgiveness if the business spent the loan proceeds on these expense items within a designated period of time and used a certain portion of the loan towards payroll expenses.

C. Scheme to Defraud

7. From in or about April 2021 through in or about March 2024, FRANCOIS devised a scheme to profit from a false PPP loan application. In total, FRANCOIS received $20,833 in PPP loan funds to which she was not entitled.

8. On or about April 2, 2021, FRANCOIS submitted an application to Fountainhead SBF LLC for a First Draw PPP loan. The application listed the gross income for a sole proprietorship purportedly making $116,500 in gross income in 2019. The application sought a PPP loan in the amount of $20,833.

9. FRANCOIS submitted false tax documents to support her materially false assertion that she had a sole proprietorship with $116,500 in gross income in 2019, including a false Schedule C tax form.

10. The PPP loan application was approved by Fountainhead SBF LLC. On or about April 22, 2021, Fountainhead SBF LLC distributed $20,833 into FRANCOIS' HarborOne Bank account ending 2897 via an interstate or foreign wire.

11. On or about March 2, 2024, FRANCOIS submitted a loan forgiveness application for the PPP loan.

12. In the PPP Loan Forgiveness Application, FRANCOIS falsely represented that 100% of the funds from the PPP Loan were used for payroll. FRANCOIS used those funds for other purposes, including personal expenses.

13. Based on the PPP Loan Forgiveness Application, the SBA forgave the entire PPP loan, plus interest.

COUNT ONE
Wire Fraud; Aiding and Abetting
(18 U.S.C. §§ 1343 and 2)

The United States Attorney charges:

14. The United States Attorney re-alleges and incorporates by reference paragraphs 1-13 of this Information.

15. On or about the date set forth below, in the District of Massachusetts and elsewhere, the defendant,

WIGENIE FRANCOIS,

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, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud, as set forth below:

Count	Approximate Date	Description
1	April 22, 2021	Wire transfer of $20,833 to FRANCOIS' HarborOne Bank account ending 2897 from Fountainhead SBF LLC that was processed via servers in and affecting interstate and foreign commerce.

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

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

The United States Attorney further alleges:

16. Upon conviction of the offense in violation of Title 18, United States Code, Section 1343, set forth in Count One, the defendant,

WIGENIE FRANCOIS,

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(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following asset:

a. $20,833 in U.S. currency, to be entered in the form of a forfeiture money judgment.

17. If any of the property described in Paragraph 16, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), 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 the 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 Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 16 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

LEAH B. FOLEY
United States Attorney

By: *\/s\/ Brian J. Sullivan*
Brian J. Sullivan
Assistant United States Attorney

Date: October 1, 2025