

Jan 23, 2023

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**23-60013-CR-MORENO/STRAUSS**

Case No. \_\_\_\_\_

18 U.S.C. § 1349

18 U.S.C. § 981(a)(1)(C)

**UNITED STATES OF AMERICA**

vs.

**EUNIDE SANON,****Defendant.****INFORMATION**

The United States Attorney charges that:

**GENERAL ALLEGATIONS**

At all times relevant to this Information:

**Requirements to Become a Registered Nurse or Licensed Practical Nurse**

1. State Boards of Nursing were established to protect the public's health by overseeing and assuring the safe practice of nursing. Boards of Nursing achieve this mission by establishing the standards for safe nursing care and issuing licenses authorizing the practice of nursing. Once a license was issued, the Boards of Nursing held licensees to provisions defined in state laws and, when necessary, acted against the licenses of those nurses who have exhibited unsafe nursing practice.

2. The purpose of a professional license was to protect the public from harm by setting minimal qualifications and competencies for safe entry-level practitioners. Nursing was regulated because it is one of the health professions that poses a risk of harm to the public if practiced by someone who is unprepared and/or incompetent.

3. Typical components of licensure to be a Registered Nurse (RN) or a Licensed Practical Nurse (LPN) included, among other things, verification of graduation from an approved pre-licensure nursing program, verification of successful completion of the National Council Licensure Examination (NCLEX), a criminal background check, and in some states—including New York—continuing education credits.

4. Once a nursing license was obtained in one jurisdiction, various state reciprocity agreements simplified the process to obtain a license and practice in another state.

#### **Defendant and Related Persons and Entities**

5. Siena Education Center LLC (Siena Education) was a Florida limited liability company with a listed address of 7491 W Oakland Park Blvd, Suite 100, Lauderhill, Florida.

6. Siena College of Health II LLC (Siena College) was a Florida limited liability company with a listed address of 7491 W Oakland Park Blvd, Suite 100, Lauderhill, Florida. According to Siena's website, Siena was licensed by the Florida Commission for Independent Education and the Florida Board of Nursing, and it offered a Practical Nursing Program and an RN Program.

7. PowerfulU Healthcare Services LLC (PowerfulU) was a Florida limited liability company with a listed address of 3601 W. Commercial Blvd., Suites 14 and 15, Fort Lauderdale, Florida. On its public Facebook page, PowerfulU advertised itself as a "group of nurses and doctors wanting to empower men and women by helping them to become health care providers."

8. Docu-Flex & More LLC (Docu-Flex) was a Florida limited liability company with a listed address of 3601 W. Commercial Blvd., Suites 14 and 15, Fort Lauderdale, Florida.

9. CEUfast, Inc., a company based in Lake City, Florida, was accredited as a provider of continuing nursing education by the American Nurses Credentialing Center's Commission on Accreditation. CEUfast, Inc.'s services were accessible via the internet at ceufast.com.

10. The New York State Education Department (NYSED) was the department of the New York state government responsible for all applications and licensure of medical professionals, including RNs and LPNs.

11. Defendant **EUNIDE SANON**, a resident of Broward County, was the Owner, Registered Agent, and Manager of Siena Education and Siena College (collectively Siena).

12. Geralda Adrien, a resident of Broward County, was the President of PowerfulU and Manager of Docu-Flex.

13. Woosvelt Predestin, a resident of Broward County, was an employee of PowerfulU and Docu-Flex.

**Conspiracy to Commit Mail Fraud and Wire Fraud  
(18 U.S.C. § 1349)**

From on or about November 17, 2018, through in or around October 2021, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendant,

**EUNIDE SANON,**

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with Geralda Adrien, Woosvelt Predestin, and others known and unknown to the United States Attorney, to commit offenses against the United States, that is:

a. to knowingly, and with the intent to defraud, devise and intend 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, knowing the pretenses, representations, and

promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly cause to be mailed certain mail matter by the United States Postal Service, according to the directions thereon, in violation of Title 18, United States Code, Section 1341; and

b. to knowingly, and with the intent to defraud, devise and intend 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, knowing the pretenses, representations, and promises were false and fraudulent when made, and for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343.

#### **Purpose of the Conspiracy**

14. It was the purpose of the conspiracy for the defendant and her co-conspirators to unlawfully enrich themselves by, among other things, selling fraudulent nursing diplomas, educational transcripts, and other credentials, and assisting the purchasers in fraudulently obtaining licensure and ultimately employment in the healthcare field.

#### **Manner and Means of the Conspiracy**

The manner and means by which the defendant and her co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

15. EUNIDE SANON, Geralda Adrien, Woosvelt Predestin, and others sold approximately 2016 false and fraudulent diplomas and educational transcripts to co-conspirators which falsely represented that the co-conspirators had completed the necessary courses and/or clinical training to obtain nursing degrees from Siena when in fact the co-conspirators had never completed the necessary courses and/or clinical training.

16. Geralda Adrien, Woosvelt Predestin, and others completed required online continuing education courses from CEUfast, Inc. on behalf of the co-conspirators and transmitted the ensuing certificates of completion to state accreditation agencies by means of wire communication in interstate and foreign commerce.

17. **EUNIDE SANON**, Geralda Adrien, Woosvelt Predestin, and others mailed and caused others to mail, by United States Postal Service, fake diplomas, transcripts, and other false and fraudulent documents to co-conspirators and to state licensing agencies, including the NYSED, on behalf of the co-conspirators.

18. In furtherance of the conspiracy, co-conspirators made electronic payments, by means of interstate wire communication, to **EUNIDE SANON**, Geralda Adrien, Woosvelt Predestin and others for providing the false and fraudulent diplomas and other licensing documents.

19. Using the false and fraudulent continuing education certifications, diplomas, transcripts, and other fraudulent documents, **EUNIDE SANON**, Geralda Adrien, Woosvelt Predestin, and others assisted co-conspirators to obtain fraudulent nursing licenses from state licensing agencies, and ultimately employment in the healthcare field.

20. Co-conspirators used the false and fraudulent diplomas, transcripts and other documents created and distributed by **EUNIDE SANON** and others, to fraudulently obtain employment and benefits at various unwitting health care providers throughout the country.

21. **EUNIDE SANON**, Geralda Adrien, Woosvelt Predestin, and others used the proceeds of the fraud for their personal use and benefit, and to further the fraud.

All in violation of Title 18, United States Code, Section 1349.

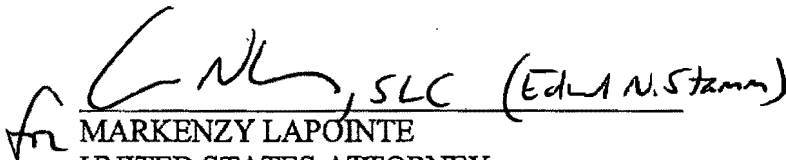
**FORFEITURE**  
**(18 U.S.C. § 981(a)(1)(C))**

1. The allegations contained in this Information are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which the defendant, **EUNIDE SANON**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1349, as alleged in this Information, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. The property subject to forfeiture as a result of the alleged offense includes, but is not limited to, the following: a forfeiture money judgment in the sum of \$1,287,633 in U.S. currency, which sum represents the value of the property subject to forfeiture, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

  
MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

  
CHRISTOPHER J. CLARK  
ASSISTANT UNITED STATES ATTORNEY