

Jan 12, 2023

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMIUNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**23-60007-CR-SINGHAL/DAMIAN**
Case No. _____18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 2
18 U.S.C. § 981(a)(1)

UNITED STATES OF AMERICA

vs.

GAIL RUSS,
CHERYL STANLEY,
KRYSTAL LOPEZ,
RICKY RILEY,
NORBERTO LOPEZ,
DAMIAN LOPEZ,
FRANCOIS LEGAGNEUR,
REYNOSO SEIDE,
CASSANDRE JEAN,
YELVA SAINT PREUX,
EVANGELINE NAISSANT,
RONY MICHEL,
VILAIRE DUROSEAU, and
YVROSE THERMITUS,
a/k/a "Yvrose Thompson,"Defendants.
_____ /INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

Requirements to Become a Registered Nurse or Licensed Practical Nurse

1. The purpose of a professional nursing license was to protect the public from harm by setting minimum 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. Boards of Nursing achieved this mission by establishing the standards for safe nursing care and issuing licenses to practice nursing.

2. According to the National Council of State Boards of Nursing, components of licensure to be a Registered Nurse (RN) or a Licensed Practical/Vocational Nurse (LPN/VN) include verification of graduation from an approved pre-licensure nursing program, verification of successful completion of the National Council Licensure Examination (NCLEX) also known as “the board exam” or “the boards,” and in some states a criminal background check.

3. The Nurse Licensure Compact increased access to care while maintaining public protection at the state level. Under the Nurse Licensure Compact, nurses can practice in other Nurse Licensure Compact states, without having to obtain additional licenses. Approximately 39 states, including Florida, have enacted Nurse Licensure Compact legislation. The Nurse Licensure Compact required that every RN or LPN/VN graduate from a board-approved RN or LPN/VN prelicensure education program. Each state’s nursing board governed the approval of nursing education programs.

4. The State of Florida enacted the Nurse Practice Act to ensure that every nurse practicing in Florida meets minimum requirements for safe practice. Fla. Stat. §§ 464.001-464.027. The Florida Board of Nursing was both a regulatory board and a state government agency legally responsible for enforcing the state’s Nurse Practice Act. The Florida Board of Nursing was responsible for establishing standards for safe nursing care and issuing licenses to practice nursing. To do so, it oversaw education requirements and rules for licensure in Florida. Among these requirements was that any person desiring to be licensed as an RN or LPN/VN had to complete the requirements for graduation from an approved program, or its equivalent as determined by the

board, for the preparation of registered nurses or licensed practical nurses, whichever was applicable. For graduates of an approved program equivalent, an applicant seeking certification to take the licensure examination has to submit an official transcript or equivalent documentation which identified all courses completed that met graduation requirements.

5. According to Florida's Nurse Practice Act, an approved pre-licensure program's curriculum must consist of:

a. At least fifty percent clinical training for a practical nursing education program, an associate degree professional nursing program, or a professional diploma nursing education program.

b. The professional or practical nursing curriculum plan must document clinical experience and theoretical instruction in medical, surgical, obstetric, pediatric, and geriatric nursing. A professional nursing curriculum plan shall also document clinical experience and theoretical instruction in psychiatric nursing. Each curriculum plan must document clinical training experience in appropriate settings that include, but are not limited to, acute care, long-term care, and community settings.

c. The professional or practical nursing education program provides theoretical instruction and clinical application in personal, family, and community health concepts; nutrition; human growth and development throughout the life span; body structure and function; interpersonal relationship skills; mental health concepts; pharmacology and administration of medications; and legal aspects of practice. A professional nursing education program must also provide theoretical instruction and clinical application in interpersonal relationships and leadership skills; professional role and function; and health teaching and counseling skills.

Defendants and Related Individuals and Entities

6. Med-Life Institute WPB, LLC (Med-Life) was a Florida limited liability company licensed by the Florida Board of Education to provide a nursing education program.

7. Palm Beach School of Nursing, LLC (Palm Beach School of Nursing) was a Florida limited liability company located in Palm Beach County, Florida. Palm Beach School of Nursing operated under the license that was issued to Med-Life and transferred to Palm Beach School of Nursing. According to Palm Beach School of Nursing's Program Outline, it offered an Associate in Science degree, and the objective of the program was to "prepare the student to meet the requirements of the Florida Department of Health and the Florida Board of Nursing for Registered Nurse Education and meet eligibility for licensing exam (NCLEX-RN) in order to work as a Registered Nurse in a variety of settings in a safe and effective manner."

8. Quisqueya School of Nursing LLC, d/b/a Sunshine Academy (Sunshine Academy) was a Florida limited liability company located in Palm Beach County, Florida. Sunshine Academy was licensed by the Florida Board of Education to provide a nursing education program. According to Sunshine Academy's Program Outline, it offered a practical nursing program, and the objective of the program was to "prepare student[s] to provide nursing care to clients in hospitals, nursing homes, home healthcare agencies, and other areas in healthcare. Upon satisfactory completion of the program the graduate is eligible to apply to sit for the National Council Licensure Examination for Practical Nursing."

9. Quisqueya Health Care Academy, LLC (Quisqueya) was a Florida limited liability company located in Palm Beach County, Florida. Quisqueya operated under the same license that had been previously issued to Sunshine Academy. According to Quisqueya's Program Outline, it offered a practical nursing program, and the objective of the program was to "prepare student[s]

to provide nursing care to clients in hospitals, nursing homes, home healthcare agencies, and other areas in healthcare. Upon satisfactory completion of the program the graduate is eligible to apply to sit for the National Council Licensure Examination for Practical Nursing.”

10. Florida College of Health LLC (Florida College of Health) was a Florida limited liability company licensed by the Florida Board of Education to provide a nursing education program.

11. Nursing Education Agency, LLC (Nursing Education Agency) was a Florida limited liability company located in Palm Beach County, Florida.

12. EDUconnect LLC (EDUconnect) was a Florida limited liability company located in Palm Beach County, Florida.

13. Unparalleled Review Services, LLC (Unparalleled Review) was a New York limited liability company located in Jamaica, New York.

14. Unity Health Care Training & Employment LLC (Unity Health Care Training) was a New Jersey limited liability company located in Maplewood, New Jersey.

15. Success Review International Services, Inc (Success Review) was a ^{New York m.w} ~~New Jersey~~ company located in Brooklyn, New York.

16. New Era Professional Prep Services LLC (New Era) was a New York limited liability company located in Baldwin, New York.

17. Jemeron Tutoring Healthcare Services LLC (Jemeron) was a New Jersey limited liability company located in Colts Neck, New Jersey.

18. Center for Advanced Training & Studies Inc (Center for Advanced Training) was a New Jersey company located in Orange, New Jersey.

19. PowerfulU Healthcare Services LLC (PowerfulU) was a Florida limited liability company located in Broward County, Florida.

20. Defendant **GAIL RUSS**, a resident of Broward County, Florida, was the Director of Student Services and the Registrar of Palm Beach School of Nursing.

21. Defendant **CHERYL STANLEY**, a resident of Collier County, Florida, was a partner in Palm Beach School of Nursing and Florida College of Health, and the Campus Director of both schools.

22. Defendant **KRYSTAL LOPEZ**, a resident of Palm Beach County, Florida, was the Director of Finance of Palm Beach School of Nursing.

23. Defendant **RICKY RILEY**, a resident of Broward County, Florida, was the Director of Nursing for Quisqueya and Palm Beach School of Nursing.

24. Defendant **NORBERTO LOPEZ**, a resident of Palm Beach County, Florida, owned and operated Nursing Education Agency.

25. Defendant **DAMIAN LOPEZ**, a resident of Palm Beach County, Florida, owned and operated EDUconnect.

26. Defendant **FRANCOIS LEGAGNEUR**, a resident of Nassau County, New York, owned and operated Unparalleled Review.

27. Defendant **REYNOSO SEIDE** was a resident of Union County, New Jersey.

28. Defendant **CASSANDRE JEAN**, a resident of Palm Beach County, Florida, owned and operated Success Review.

29. Defendant **YELVA SAINT PREUX**, a resident of Suffolk County, New York, owned and operated New Era.

30. Defendant **EVANGELINE NAISSANT**, a resident of Nassau County, New York, operated New Era.

31. Defendant **RONY MICHEL**, a resident of Monmouth County, New Jersey, owned and operated Jemeron.

32. Defendant **VILAIRE DUROSEAU**, a resident of Essex County, New Jersey, owned and operated Center for Advanced Training.

33. **YVROSE THERMITUS**, a/k/a "**Yvrose Thompson**," a resident of Union County, New Jersey, owned and operated Unity Health Care Training.

34. Johanah Napoleon, a resident of Palm Beach County, Florida, owned Med-Life, Palm Beach School of Nursing, Sunshine Academy, Quisqueya, and Florida College of Health.

35. Geralda Adrien, a resident of Broward County, Florida, was the owner and Manager of PowerfulU.

36. Co-conspirator 1 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

37. Co-conspirator 2 obtained a diploma and transcript issued by Quisqueya purporting to show that he/she attended Quisqueya and completed the necessary courses and/or clinicals to obtain an LPN diploma.

38. Co-conspirator 3 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

39. Co-conspirator 4 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

40. Co-conspirator 5 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

41. Co-conspirator 6 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

42. Co-conspirator 7 obtained a diploma and transcript issued by Palm Beach School of Nursing purporting to show that he/she attended Palm Beach School of Nursing and completed the necessary courses and/or clinicals to obtain an Associate Degree in Nursing diploma.

43. Health Care Provider-1 (HCP-1) was a Skilled Nursing Facility located in Ohio that employed licensed nurses to care for patients, including Medicare and Medicaid patients.

44. Health Care Provider-2 (HCP-2) was a rehabilitation facility located in New York that employed licensed nurses to care for homebound pediatric patients, including Medicare patients.

45. Health Care Provider-3 (HCP-3) was an Assisted Living Facility located in New Jersey that employed licensed nurses to care for elderly patients, including Medicare and Medicaid patients.

46. Health Care Provider-4 (HCP-4) was a Veterans Affairs (VA) Medical Center located in New York that employed licensed nurses to care for patients eligible for VA Health Care.

47. Health Care Provider-5 (HCP-5) was a home health facility located in Massachusetts that employed licensed nurses to care for homebound pediatric patients, including Medicare and Medicaid patients.

48. Health Care Provider-6 (HCP-6) was a skilled nursing care facility located in New Jersey that employed licensed nurses to care for elderly patients, including Medicare patients.

49. Health Care Provider-7 (HCP-7) was a skilled nursing care facility located in New York that employed licensed nurses to care for elderly patients, including Medicare and Medicaid patients.

COUNT 1
Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349)

1. The General Allegations section of this Indictment is re-alleged and incorporated by reference as if fully set forth herein.

2. From at least as early as in or around April of 2016, and continuing through in or around July of 2021, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**GAIL RUSS,
CHERYL STANLEY,
KRYSTAL LOPEZ,
RICKY RILEY,
NORBERTO LOPEZ,
DAMIAN LOPEZ,
FRANCOIS LEGAGNEUR,
REYNOSO SEIDE,
CASSANDRE JEAN,
YELVA SAINT PREUX,
EVANGELINE NAISSANT,
RONY MICHEL,
VILAIRE DUROSEAU, and
YVROSE THERMITUS,
a/k/a "Yvrose Thompson,"**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other, and with Johanah Napoleon, Geralda Adrien, co-conspirators 1-7, and others known and unknown to the Grand Jury, to commit wire fraud, that is, 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

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) soliciting and recruiting co-conspirators, via interstate wire communications, seeking nursing credentials to obtain employment as an RN or LPN/VN in the health care field; (b) creating and distributing, via interstate wire communications, false and fraudulent diplomas and transcripts for co-conspirators seeking RN or LPN/VN licensure and employment in the health care field; (c) using the false and fraudulent documents to obtain employment, pay, and other benefits in the health care field; (d) concealing the use of fraudulent documents used to obtain employment in the health care field; and (e) using proceeds of the conspiracy for their personal use and benefit, and the use and benefit of others, and to further the conspiracy.

Manner and Means of the Conspiracy

The manner and means by which the defendants and their co-conspirators sought to

accomplish the object and purpose of the conspiracy included, among others, the following:

4. **DAMIAN LOPEZ, NORBERTO LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** and others, via interstate wire communications, solicited and recruited co-conspirators, including co-conspirators 1-7, and others, seeking nursing credentials and employment as an RN or LPN/VN in the health care field.

5. **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** Johanah Napoleon, Geralda Adrien, and others sent and caused others to send, via interstate wire communications, information used to create false and fraudulent official transcripts and diplomas from Palm Beach School of Nursing, Quisqueya, and Florida College of Health.

6. **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** Johanah Napoleon, Geralda Adrien, and others, created and distributed, and caused to be created and distributed, via interstate wire communications, false and fraudulent transcripts and diplomas to co-conspirators, including co-conspirators 1-7, and others falsely and fraudulently representing that the co-conspirators attended Palm Beach School of Nursing, Quisqueya, or Florida College of Health in Florida and completed the necessary courses and/or clinicals to obtain

RN or LPN/VN diplomas, when in fact the co-conspirators had never actually completed the necessary courses and/or clinicals.

7. In furtherance of the conspiracy, co-conspirators including co-conspirators 1-7 and others, used the false and fraudulent diplomas and transcripts and other records created and distributed, and caused to be created and distributed, by **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** Johana Napoleon, Geralda Adrien, and others, to obtain licensure as an RN or LPN/VN in various states including Ohio, New York, New Jersey, and Massachusetts.

8. Co-conspirators, including co-conspirators 1-7, and others, used the false and fraudulent diplomas, transcripts and other documents created and distributed, and caused to be created and distributed, by **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** Johanah Napoleon, Geralda Adrien, and others, to fraudulently obtain employment and benefits as an RN or LPN/VN at various unwitting health care providers throughout the country, including at HCP-1-7. Those health care providers hired and paid salaries, wages, and other benefits to the RNs and LPN/VNs based on their fraudulent credentials.

9. **GAIL RUSS, CHERYL STANLEY, NORBERTO LOPEZ, KRYSTAL LOPEZ, RICKY RILEY, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO**

SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU, YVROSE THERMITUS, a/k/a “Yvrose Thompson,” Johana Napoleon, and Geralda Adrien, together with co-conspirators 1-7 and others, used the proceeds of the conspiracy for their personal use and benefit, and to further the conspiracy.

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

COUNTS 2-25
Wire Fraud
(18 U.S.C. § 1343)

1. The General Allegations section of this Indictment is realleged and incorporated by reference as if fully set forth herein.

2. From at least as early as in or around April of 2016, and continuing through in or around July of 2021, in Broward and Palm Beach Counties, in the Southern District of Florida, and elsewhere, the defendants,

**GAIL RUSS,
CHERYL STANLEY,
KRYSTAL LOPEZ,
RICKY RILEY,
NORBERTO LOPEZ,
DAMIAN LOPEZ,
FRANCOIS LEGAGNEUR,
REYNOSO SEIDE,
CASSANDRE JEAN,
YELVA SAINT PREUX,
EVANGELINE NAISSANT,
RONY MICHEL,
VILAIRE DUROSEAU, and
YVROSE THERMITUS,
a/k/a “Yvrose Thompson,”**

did 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 Scheme and Artifice

3. It was a purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves by, among other things: (a) soliciting and recruiting accomplices, via interstate wire communications, seeking nursing credentials to obtain employment as an RN or LPN/VN in the health care field; (b) creating and distributing, via interstate wire communications, false and fraudulent diplomas and transcripts for accomplices seeking RN and LPN/VN licensure and employment in the health care field; (c) using the false and fraudulent documents to obtain employment, pay, and other benefits in the health care field; (d) concealing the use of fraudulent documents used to obtain employment in the health care field; and (e) using the proceeds of the fraud for their personal use and benefit, and the use and benefit of others, and to further the fraud.

The Scheme and Artifice

4. Paragraphs 4 through 9 of the Manner and Means section of Count 1 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

Use of the Wires

5. On or about the dates set forth below, in the Southern District of Florida, and elsewhere, the defendants, as specified below, for the purposes of executing the above-described scheme and artifice to defraud, 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 as described below:

Count	Defendant(s)	Approx. Date	Description of Wire Transmission
2	DAMIAN LOPEZ	1/26/2018	Text message via interstate wire from DAMIAN LOPEZ to Johanah Napoleon in the Southern District of Florida with an attachment containing nursing accomplice payment information.
3	GAIL RUSS, YELVA SAINT PREUX and EVANGELINE NAISSANT	3/6/2018	Email via interstate wire from EVANGELINE NAISSANT to GAIL RUSS in the Southern District of Florida providing the address of New Era Professional Prep and the name of its director YELVA SAINT PREUX
4	GAIL RUSS, CHERYL STANLEY, and FRANCOIS LEGAGNEUR	5/10/2018	Deposit via interstate wire of check number 1352 in the amount of \$1,360 drawn on the Palm Beach School of Nursing LLC account as payment to FRANCOIS LEGAGNEUR directed by CHERYL STANLEY
5	GAIL RUSS, CHERYL STANLEY, and FRANCOIS LEGAGNEUR	5/22/2018	Deposit via interstate wire of check number 1373 in the amount of \$1,360 drawn on the Palm Beach School of Nursing LLC account as payment to FRANCOIS LEGAGNEUR directed by CHERYL STANLEY
6	GAIL RUSS and CHERYL STANLEY	6/21/2018	Email via interstate wire from CHERYL STANLEY to Johanah Napoleon in the Southern District of Florida forwarding a message from the New York State Education Department stating that Florida College of Health "has no legal authority" to offer a Nursing program in New York State
7	NORBERTO LOPEZ	8/8/2018	Email via interstate wire from Johanah Napoleon in the Southern District of Florida to NORBERTO LOPEZ containing blank templates for Palm Beach School of Nursing diplomas and transcripts
8	KRYSTAL LOPEZ and REYNOSO SEIDE	12/03/2018	Email via interstate wire from REYNOSO SEIDE to KRYSTAL LOPEZ in the Southern District of Florida containing information for nursing accomplices recruited in New Jersey
9	RONY MICHEL	4/14/2019	Text message via interstate wire from RONY MICHEL to Johanah Napoleon in the Southern District of Florida in which they discuss fees for his students

Count	Defendant(s)	Approx. Date	Description of Wire Transmission
10	VILAIRE DUROSEAU and RICKY RILEY	7/9/2019	Johanah Napoleon in the Southern District of Florida forwarded an email via interstate wire from VILAIRE DUROSEAU to RICKY RILEY containing information about nursing accomplices traveling to Florida to complete registrations and background checks
11	RICKY RILEY	10/31/2019	RICKY RILEY via interstate wire forwarded an email to Johanah Napoleon in the Southern District of Florida from the Florida Board of Nursing in which RICKY RILEY acknowledged that Palm Beach School of Nursing was terminated by the Florida Board of Nursing in 2017 and was in Teach Out status
12	GAIL RUSS, RICKY RILEY and CASSANDRE JEAN	3/9/2020	Email via interstate wire from RICKY RILEY in the Southern District of Florida to CASSANDRE JEAN, GAIL RUSS , and Johanah Napoleon discussing clinical rotations for accomplice nursing applicants
13	GAIL RUSS	4/13/2020	Email via interstate wire from GAIL RUSS in the Southern District of Florida to nursing applicant R.C. in which RUSS states she will speak to R.C.'s recruiter to get the dates for R.C.'s transcript
14	GAIL RUSS and VILAIRE DUROSEAU	5/11/2020	Email via interstate wire from VILAIRE DUROSEAU to GAIL RUSS in the Southern District of Florida listing names and grades of accomplice nursing applicants seeking to obtain Palm Beach School of Nursing diplomas and transcripts
15	GAIL RUSS and FRANCOIS LEGAGNEUR	7/17/2020	Email via interstate wire from FRANCOIS LEGAGNEUR to GAIL RUSS in the Southern District of Florida containing a transcript picture and requesting that GAIL RUSS modify a graduation date for an accomplice nursing applicant
16	GAIL RUSS and FRANCOIS LEGAGNEUR	7/17/2020	Email via interstate wire from FRANCOIS LEGAGNEUR to GAIL RUSS in the Southern District of Florida requesting that RUSS modify dates on nursing accomplice diplomas and transcripts
17	GAIL RUSS and CASSANDRE JEAN	9/21/2020	Email via interstate wire from CASSANDRE JEAN to GAIL RUSS in the Southern District of Florida requesting that RUSS produce official transcripts and diplomas for the nursing applicants whose information is contained in the attachments

Count	Defendant(s)	Approx. Date	Description of Wire Transmission
18	GAIL RUSS and RONY MICHEL	1/3/2021	Email via interstate wire from RONY MICHEL to GAIL RUSS in the Southern District of Florida requesting that RUSS prepare transcripts for his students and send their information to the New York Board of Nursing and the New Jersey Board of Nursing
19	GAIL RUSS and RICKY RILEY	5/11/2021	Email via interstate wire from RICKY RILEY in the Southern District of Florida to the New York State Education Department, Office of Professional Licensing, requesting that New York allow nursing applicants to obtain licensure
20	GAIL RUSS and CASSANDRE JEAN	5/18/2021	Email via interstate wire from CASSANDRE JEAN to GAIL RUSS requesting that RUSS produce official transcripts and diplomas for the accomplice nursing applicants whose information is contained in the attachments
21	GAIL RUSS and YVROSE THERMITUS	6/1/2021	Email via interstate wire from YVROSE THERMITUS to GAIL RUSS requesting that RUSS edit a nursing accomplice transcript prior to sending it to Florida Board of Nursing
22	GAIL RUSS and RONY MICHEL	6/2/2021	Email via interstate wire from RONY MICHEL to GAIL RUSS requesting that RUSS send transcripts on behalf of his students to the Florida Board of Nursing
23	VILAIRE DUROSEAU	6/2/2021	Proponent Federal Credit Union wire payment via interstate wire in the amount of \$30,000 from VILAIRE DUROSEAU to Johanah Napoleon for Palm Beach School of Nursing diplomas and transcripts
24	GAIL RUSS and YVROSE THERMITUS	6/17/2021	YVROSE THERMITUS via interstate wire forwarded an email to GAIL RUSS from a nursing accomplice requesting that RUSS send information to the Florida Board of Nursing on behalf of the accomplice
25	GAIL RUSS and CASSANDRE JEAN	6/18/2021	Email via interstate wire from CASSANDRE JEAN to GAIL RUSS requesting that RUSS produce official transcripts and diplomas for nursing applicants whose information is contained in the attachments

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

FORFEITURE
(18 U.S.C. § 981(a)(1))

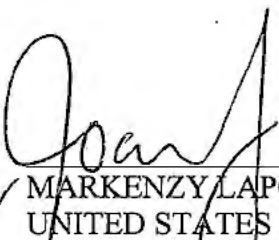
1. The allegations contained in this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of certain property in which any of the defendants, **GAIL RUSS, CHERYL STANLEY, KRYSTAL LOPEZ, RICKY RILEY, NORBERTO LOPEZ, DAMIAN LOPEZ, FRANCOIS LEGAGNEUR, REYNOSO SEIDE, CASSANDRE JEAN, YELVA SAINT PREUX, EVANGELINE NAISSANT, RONY MICHEL, VILAIRE DUROSEAU,** and **YVROSE THERMITUS, a/k/a "Yvrose Thompson,"** have an interest.

2. Upon conviction of a violation, or conspiracy to commit a violation, of Title 18, United States Code, Section 1343, as alleged in this Indictment, the defendant so convicted 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).

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

A TRUE BILL

FOREPERSON


for **MARKENZY LAPOINTE**
UNITED STATES ATTORNEY


CHRISTOPHER J. CLARK
ASSISTANT UNITED STATES ATTORNEY