

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA  
2025 JUN 20 PM 02:36  
CAROL L. MICHEL, CLERK  
*AB*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR  
THEFT CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

v.

\*

SECTION:

ZOE MARIE FRANCIS

\*

VIOLATION:

18 U.S.C. § 666(a)(1)(A)

\*

\* \* \*

The United States Attorney charges that:

**COUNT 1**

(Theft Concerning Programs Receiving Federal Funds)

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The Institute of Women and Ethnic Studies ("IWES") was a charitable non-profit organization under Section 501(c)(3) of the Internal Revenue Code located in New Orleans, Louisiana, within the Eastern District of Louisiana. IWES's mission was to improve the physical, mental, health, and quality of life for members of the community using research, community-based programs, training, and advocacy. IWES received more than \$1 million annually from 2020 through 2023 in funds from the federal government, including funds from the United States Department of Health and Human Services.

✓ *USA*  
\_\_\_\_ Fee \_\_\_\_\_  
\_\_\_\_ Process \_\_\_\_\_  
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\_\_\_\_ CtRmDep \_\_\_\_\_  
\_\_\_\_ Doc. No. \_\_\_\_\_

2. The defendant, **ZOE MARIE FRANCIS** (“**FRANCIS**”), resided within the Eastern District of Louisiana. **FRANCIS** was the Chief Operating Officer of IWES from in or around November 2019 to in or around December 2023.

3. Be Free Healing Center LLC, also known as Be Free Healing Institute (collectively, “Be Free Healing”), was a Louisiana limited liability company. **FRANCIS** was the manager of Be Free Healing, and Be Free Healing used **FRANCIS**’s bank accounts. Be Free Healing used the name “Marie Chase” on contracts.

4. During **FRANCIS**’s employment with IWES, she received unauthorized pay increases, bonuses, and vacation hours adjustments. Additionally, IWES funds were spent on unauthorized expenditures for two personal events; payments for sham contracts between IWES and Be Free Healing using a fictitious name but sent to **FRANCIS**’s personal bank account; and unauthorized Amazon purchases.

**B. THE OFFENSE:**

From in or around April 2021, and continuing through in or around December 2023, in the Eastern District of Louisiana and elsewhere, the defendant, **ZOE MARIE FRANCIS**, being an agent of IWES, an organization that received federal funds in excess of \$10,000 in each of the 2020, 2021, 2022, and 2023 fiscal years, did knowingly embezzle, steal, obtain by fraud, intentionally misapply, and convert without authority to the use of a person other than the rightful owner, property valued at \$5,000 or more that was owned by, and in the care, custody, and control of IWES.

All in violation of Title 18, United States Code, Sections 666(a)(1)(A).

**NOTICE OF FORFEITURE**

1. The allegations of Count 1 of this Bill of Information are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Count 1, the defendant, **ZOE MARIE FRANCIS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 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 offense.

3. If any of the property described above as being subject to forfeiture, 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 person;
- 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 subdivided without difficulty,

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

MICHAEL M. SIMPSON  
ACTING UNITED STATES ATTORNEY

LORINDA I. LARYEA  
ACTING CHIEF  
U.S. DEPARTMENT OF JUSTICE  
CRIMINAL DIVISION, FRAUD SECTION

Nicholas Moses for GAC  
GARY A. CROSBY II  
Trial Attorney  
Criminal Division, Fraud Section  
United States Department of Justice

Nicholas Moses  
NICHOLAS D. MOSES  
Assistant United States Attorney  
Eastern District of Louisiana

New Orleans, Louisiana  
June 20, 2025

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

**United States District Court**

FOR THE

EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

vs.

ZOE MARIE FRANCIS

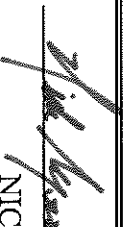
BILL OF INFORMATION FOR  
THEFT CONCERNING PROGRAMS  
RECEIVING FEDERAL FUNDS

Violation(s): 18 U.S.C. §§ 666(a)(1)(A) & 2

Filed \_\_\_\_\_, 20 25

\_\_\_\_\_, Clerk.

By \_\_\_\_\_, Deputy

  
NICHOLAS D. MOSES  
Assistant United States Attorney