

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

**FRUCTUOSO DE JESUS GOMEZ
AGUDELO, a/k/a JESUS GOMEZ,
a/k/a W.G.,**

Defendant.

No. 26-cr-39-SE-TSM-01

Counts 1-4: Wire Fraud
(18 U.S.C. § 1343)

Counts 5 & 6: False Statements
(18 U.S.C. § 1001(a)(1))

Counts 7 & 8: False Statements in
Health Care Matters
(18 U.S.C. § 1035(a)(1))

Count 9: Aggravated Identity Theft
(18 U.S.C. § 1028A)

INDICTMENT

The Grand Jury charges:

Background Information

1. Supplemental Security Income (SSI) and Social Security retirement (also known as Old-Age Insurance) are federal benefits programs administered by the Social Security Administration (SSA).

2. SSI provides monthly payments to U.S. citizens and qualified aliens that are old or disabled and have little or no income or resources. SSA conducts periodic reviews of SSI beneficiaries to confirm they still meet eligibility requirements.

3. Social Security retirement provides monthly payments to U.S. citizens and qualified aliens that are elderly and paid Social Security taxes for 10 years or more.

4. Section 8 (officially known as the Housing Choice Voucher Program) helps low-income elderly and disabled U.S. citizens and eligible noncitizens pay rent in the private housing market. Section 8 is funded by the U.S. Department of Housing and Urban Development

(HUD). In New Hampshire, individuals may apply for Section 8 through local housing authorities, such as the Nashua Housing and Redevelopment Authority, which also administer Section 8 on behalf of HUD. Section 8 beneficiaries are required to reapply for benefits on a regular basis to confirm continued eligibility.

5. The Supplemental Nutrition Assistance Program (SNAP) provides food benefits to low-income U.S. citizens and certain lawful resident aliens. SNAP is funded by the U.S. Department of Agriculture (USDA). In New Hampshire, individuals may apply for SNAP benefits through the New Hampshire Department of Health & Human Services (NH-HHS), which administers the program on behalf of the USDA. SNAP beneficiaries are required to reapply for benefits on a regular basis to confirm continued eligibility

6. Medicare is a federal health insurance program for older or disabled U.S. citizens and qualified aliens. It is funded by the U.S. Department of Health and Human Services (HHS). SSA processes Medicare applications and handles enrollment.

7. Medicaid is a joint federal and state health insurance program for U.S. citizens and qualified aliens with limited resources. It is primarily funded by HHS. In New Hampshire, individuals may apply for Medicaid through NH-HHS, which manages eligibility and distribution of benefits on behalf of HHS. Medicaid recipients are subject to annual redeterminations and requests for information to confirm continued eligibility.

8. When applying for Social Security benefits, Section 8, SNAP, Medicare, and Medicaid, individuals are required to provide truthful information regarding, among other things, their name, date and place of birth, Social Security number (SSN), and citizenship status. They must also submit supporting documentation. Applications are submitted under penalty of perjury.

COUNTS ONE THROUGH FOUR
[18 U.S.C. § 1343 – Wire Fraud]

The Scheme and Artifice to Defraud

9. Beginning on an unknown date but starting no later than August 31, 2002, and continuing through on or about December 1, 2025, the defendant devised and intended to devise a scheme and artifice to defraud SSA by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

It was part of the scheme that:

10. The defendant falsely and fraudulently represented he was a U.S. citizen named W.G. to obtain SSI and Social Security retirement benefits he was otherwise ineligible for.

11. To deceive SSA, the defendant provided W.G.'s true name, date of birth (DOB), SSN, and other means of identification.

12. SSA paid the defendant approximately \$200,000 in Social Security benefits he was not entitled to from August 2002 to December 2025.

The Offenses

13. On or about the dates in the chart below, in the District of New Hampshire and elsewhere, the defendant,

FRUCTUOSO DE JESUS GOMEZ AGUDELO,

a/k/a JESUS GOMEZ, a/k/a W.G.,

for the purpose of executing the scheme described above, and attempting to do so, did cause to be transmitted by means of wire communication in interstate commerce writings, signs, and signals, namely, the following Social Security retirement benefits payments from the United States Treasury to the defendant's bank account in New Hampshire:

Count	Date	Payment Amount
1	12/30/2022	\$914.00
2	12/29/2023	\$943.00
3	12/31/2024	\$967.00
4	12/01/2025	\$967.00

All in violation of Title 18, United States Code, Section 1343.

COUNT FIVE

[18 U.S.C. § 1001(a)(1) – False Statements]

14. Beginning on an unknown date, but at least from in and around August 2022 through in and around June 2026, in the District of New Hampshire and elsewhere, the defendant,

FRUCTUOSO DE JESUS GOMEZ AGUDELO,

a/k/a JESUS GOMEZ, a/k/a W.G.,

knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device a material fact within the jurisdiction of the Department of Housing and Urban Development, a federal agency within the executive branch of the United States Government, by using a false name, date of birth, Social Security number, and other means of identification to obtain Section 8 benefits to which he was not entitled.

All in violation of Title 18, United States Code, Section 1001(a)(1).

COUNT SIX

[18 U.S.C. § 1001(a)(1) – False Statements]

15. Beginning from in and around June 2002 through in and around June 2026, in the District of New Hampshire and elsewhere, the defendant,

FRUCTUOSO DE JESUS GOMEZ AGUDELO,

a/k/a JESUS GOMEZ, a/k/a W.G.,

knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device a material fact within the jurisdiction of the Department of Agriculture, a federal agency within the executive branch of the United States Government, by using a false name, date of birth, Social Security number, and other means of identification to obtain approximately \$27,000 in SNAP benefits to which he was not entitled.

All in violation of Title 18, United States Code, Section 1001(a)(1).

COUNT SEVEN

[18 U.S.C. § 1035(a)(1) – False Statements in Health Care Matters]

16. Beginning from in and around June 2002 through in and around June 2026, in the District of New Hampshire and elsewhere, the defendant,

FRUCTUOSO DE JESUS GOMEZ AGUDELO,

a/k/a JESUS GOMEZ, a/k/a W.G.,

knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device a material fact in connection with the delivery of and payment for health care benefits, items, and services involving Medicaid, a health care benefit program as defined in 18 U.S.C. § 24(b), by using a false name, date of birth, Social Security number, and other means of identification to obtain approximately \$230,000 in Medicaid benefits to which he was not entitled.

All in violation of Title 18, United States Code, Section 1035(a)(1).

COUNT EIGHT

[18 U.S.C. § 1035(a)(1) – False Statements in Health Care Matters]

17. Beginning from in and around October 2018 through in and around June 2026, in the District of New Hampshire and elsewhere, the defendant,

FRUCTUOSO DE JESUS GOMEZ AGUDELO,

a/k/a JESUS GOMEZ, a/k/a W.G.,

knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device a material fact in connection with the delivery of and payment for health care benefits, items, and services involving Medicare, a health care benefit program as defined in 18 U.S.C. § 24(b), by using a false name, date of birth, Social Security number, and other means of identification to obtain approximately \$41,000 in Medicare benefits to which he was not entitled.

All in violation of Title 18, United States Code, Section 1035(a)(1).

COUNT NINE

[Aggravated Identity Theft – 18 U.S.C. § 1028A]

18. The Grand Jury realleges paragraphs 4, 8, and 14.

19. On or about August 18, 2022, in the District of New Hampshire and elsewhere, the defendant,

FRUCTUOSO DE JESUS GOMEZ AGUDELO,

a/k/a JESUS GOMEZ, a/k/a W.G.,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(4), to wit False Statements in violation of 18 U.S.C. § 1001(a)(1), as alleged in Count 5 of this Indictment, knowing that means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A.

NOTICE OF FORFEITURE

Upon conviction of one or more of the wire fraud offenses set forth in Counts 1 through 4, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes, or is derived from proceeds traceable to the offense, including, but not limited to a sum of money equal to the proceeds the

defendant received as a result of the charged offense.

Upon conviction of one or more of the false statements offenses set forth in Counts 7 and 8, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), any property, real or personal, which constitutes, or is derived from proceeds traceable to the offense, including, but not limited to a sum of money equal to the proceeds the defendant received as a result of the charged offense

Upon conviction of the identity theft offense set forth in Count 9, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 1028(b), any property involved in the offense, and pursuant to 18 U.S.C. § 982(a)(2)(B), any property, real or personal, which constitutes, or is derived from proceeds traceable to the offense, including, but not limited to a sum of money equal to the proceeds the defendant received as a result of the charged offense.

All in accordance with 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B), 1028(b), 28 U.S.C. § 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

Dated: June 3, 2026

/s/ Foreperson

Foreperson of the Grand Jury

ERIN CREEGAN
UNITED STATES ATTORNEY

By: /s/ Heather M. Anderson
Heather M. Anderson
Special Assistant U.S. Attorney

Alexander S. Chen
Assistant United States Attorney