UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-20036-MOORE

UNITED STATES OF AMERICA

vs.

DANIELA RENDON,

Defendant.
_________________________________/

FACTUAL BASIS

The United States of America and Defendant Daniela Rendon ("RENDON") agree that had this case proceeded to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Southern District of Florida.

RENDON owned Daniela Rendon PA ("Rendon PA"), a Florida LLC. In the spring of 2020, Rendon PA's principal place of business was RENDON's apartment in Miami, Florida.

On April 4, 2020, RENDON submitted an electronic application for an Economic Injury Disaster Loan ("EIDL") on behalf of Rendon PA to the Small Business Administration ("SBA"), causing a wire transmission from the Southern District of Florida to outside the State of Florida. The SBA assigned this application number 3302281940.

The SBA intake form represented that Rendon PA was a real estate developer, that its gross revenues from January 31, 2019 until January 31, 2020 were $91,976,250, and that its cost of goods sold was $2,000,000. RENDON knew that these figures were false and that they could cause the SBA to issue an EIDL loan to Rendon PA greater than that to which it was entitled. In fact, RENDON was a sales associate for A3 Development LLC, for which she received biweekly checks of $2,000, payable to Rendon PA. From January 31, 2019 until January 31, 2020, deposits and additions to Rendon PA's bank account totaled approximately $104,994, of which approximately $35,835 were deposits from RENDON's boyfriend.

On June 14, 2020, RENDON submitted an electronic EIDL intake application to the SBA for Rendon Holdings LLC ("Rendon Holdings"), a Wyoming LLC. The SBA assigned this application number 3304506233. The SBA intake form represented that Rendon Holdings did business as Rendon PA, that its gross revenues from January 31, 2019 until January 31, 2020 were $91,976,250, and that its cost of goods sold was $2,000,000. In fact, total deposits and additions to Rendon Holdings were approximately $9,987.74. The SBA denied the applications for Rendon PA and Rendon Holdings.

The information contained in this proffer is not a complete recitation of all the facts and circumstances of this case, but the parties admit that it is sufficient to prove beyond a reasonable doubt a violation of Title 18, United States Code, Section 1343, that is, wire fraud, as charged in Count 1 of the Indictment.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: 4/21/23 By: ____________________
JONATHAN BAILYN
ASSISTANT UNITED STATES ATTORNEY

Date: 4/18/23 By: ____________________
ROBERT MANDELL
ATTORNEY FOR DEFENDANT

Date: 04 / 13 / 2023 By: ____________________
DANIELA RENDON
DEFENDANT