.UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 26-CR-60019-ALTMAN

UNITED STATES OF AMERICA

vs.

ROODY METELUS,

Defendant.
_______________________________/

FACTUAL PROFFER

The United States of America and Defendant Roody Metelus ("METELUS") agree that had this case proceeded to trial, the government would have proven, beyond a reasonable doubt, the following facts, among others, pertaining to a violation of Title 18, United States Code, Section 371, which occurred in the Southern District of Florida and elsewhere.

From in or around January 2021, through in or around January 2022, METELUS, a resident of Broward County, Florida, willfully and knowingly conspired with others to commit wire fraud, and having the intent to defraud, devised and executed a scheme to defraud, by preparing false and fraudulent tax forms for customers to use in the submission of fraudulent loan applications under the Paycheck Protection Program ("PPP"), a program funded under the Coronavirus Aid, Relief, and Economic Security ("CARES") Act. The PPP loans were funded by private lenders, but were 100% guaranteed by the U.S. Small Business Administration ("SBA").

METELUS was a tax preparer who owned a tax preparation business named JRS Tax Services, LLC, d/b/a Liberty Tax Service, located in Dania Beach, Florida. JRS Tax Services had a franchise agreement with Company 1, which allowed it to use the trademarks, marketing, operating procedures, and operating software of Company 1. METELUS's office was located in Dania Beach, Florida.

Company 1 had an arrangement with Bank 1 for the franchisees of Company 1 to submit PPP applications on behalf of their customers to Bank 1. Starting in January 2021, METELUS recruited his tax customers and others to apply for PPP loans. METELUS prepared the loan applications and supporting documents, falsely listing the loan applicants as sole proprietors, even though many were wage earners who did not have their own business. METELUS had the loan applications submitted to Bank 1 via its on-line system supported by Bank Processor 1. Both Bank 1 and Bank Processor 1 were located outside of Florida. The defendant agrees that the fraud scheme in this case involved the use of interstate wires to further the scheme.

Under the PPP rules, the amount of annual income that could be reported for an individual or a sole proprietorship was capped at $100,000, which meant that a PPP loan for a sole proprietorship would be no more than $20,833 (2.5 x average monthly payroll). All of METELUS's falsified loan applications had the same characteristics: (1) the same three supporting documents, consisting of a false IRS Schedule C for tax year 2019, a false IRS Schedule SE for tax year 2019, and a false Self-Employment Ledger for tax year 2020; (2) the falsified Schedules C listed net income from the business in an amount ranging between $95,500 and $99,000, in order to maximize the loan amount; (3) the falsified Self-Employment Ledger listed a breakdown of monthly income and expenses; and (4) the dollar figures on the falsified Self-Employment Ledger for tax year 2020 were exactly the same as the dollar figures reported on the falsified Schedule C for tax year 2019.

Between January and March of 2021, METELUS caused the submission of more than 200 false and fraudulent PPP loan applications to Bank 1, which totaled approximately

$4,151,159 in loan amounts requested. Bank 1 funded approximately 116 PPP loan applications totaling approximately $2,337,615.

Many of the loan applicants were customers of METELUS for whom METELUS had prepared tax returns. For instance, A.W. was a customer of METELUS going back to 2014. Company 1's records indicated that METELUS had prepared A.W.'s 2020 tax return and had it filed January 23, 2021, three weeks before he prepared the falsified tax documents for A.W.'s PPP loan. A.W.'s 2020 tax return listed that A.W. had earned $38,055 in wages, and had no Schedule C. For 2019, METELUS had prepared A.W.'s tax return and reported $54,922 in wages and no Schedule C. Company 1's records also had an unfiled 2019 tax return prepared by METELUS for A.W. with a Schedule C that falsely reported gross income of $121,250 and a net profit of $96,376.

If called to testify, A.W. would state that when he was at METELUS's office to have his taxes prepared, METELUS offered him a PPP loan, and said that it would not need to be paid back. A.W. would state that METELUS prepared the PPP loan application on his (METELUS's) computer and submitted the application on his (A.W.'s) behalf. A.W. would state that he did not provide METELUS any of the false figures, and that METELUS presented him with the Self-Employment Ledger containing false amounts, which A.W. proceeded to sign because he wanted the loan money. On or about February 14, 2021, Bank 1 received a false PPP loan application submitted through its on-line portal on behalf of A.W. that contained a false 2019 Schedule C, a false 2019 Schedule SE, and a false Self-Employment Ledger for 2020. The false Schedule C listed gross income of $121,250, and net income of $96,376. Bank 1 disbursed a PPP loan in the amount of $17,525. A.W. would testify that METELUS charged him $1,500 for the loan application, and that he paid METELUS in cash.

Many of the loan applicants were not prior customers of METELUS, but people who were referred to METELUS for a PPP loan. These non-Liberty Tax Service customers were reflected on Company 1's records as "walk-outs," as people for whom METELUS had begun to prepare a tax document, but the tax document had not been completed and filed with the IRS. For instance, Company 1's records indicated that on March 2, 2021, METELUS had prepared a tax document for W.B., but it had not been submitted to the IRS and W.B. was listed as a "walk-out" from METELUS's office. In fact, on or about March 2, 2021, METELUS caused the submission of a false and fraudulent PPP loan application to Bank 1 on behalf of W.B., which included a falsified 2019 Schedule C for a business with a net income of $97,508, a 2019 Schedule SE, and a Self-Employment Ledger signed March 2, 2021. Bank 1 disbursed a PPP loan to W.B. in the approximate amount of $20,453.12.

After Bank 1 stopped approving PPP loans submitted by METELUS, METELUS assisted W.B. in applying for a fraudulent second draw PPP loan using a different lender. The fraudulent loan application included a falsified 2020 Schedule C that reported W.B. had net income from a business in the amount of $95,156. The Schedules C used for both loans indicated that W.B. was a personal trainer. On or about May 13, 2021, the lender disbursed the amount of $20,833 to W.B. The IRS reported that W.B. had filed no tax returns for tax years 2019 or 2020.

If called to testify, W.B. would state that he was put in contact with METELUS through a friend as someone who could get him money. W.B. met with METELUS at his office, and later provided his friend with W.B.'s personal identifiers, including his bank account and email address, which his friend was to pass along to METELUS. W.B. understood that he would not have to pay the loan back. W.B. would deny that he was a personal trainer, or that he had said to anyone that he was a personal trainer, or that he had a business of any kind. Regarding the second draw loan, W.B. would testify that METELUS contacted him about it, and that he did not need to provide his information again because METELUS already had it. W.B. paid some portion of his loan proceeds to METELUS and to the friend who referred him to METELUS. W.B. believes he paid them through a combination of cash and cash app.

METELUS's bank account reflects that between May 27, 2021 and June 3, 2021, W.B. made Zelle payments to METELUS's bank account totaling $4,700, including a payment of $1,000 on June 3, 2021.

The defendant agrees that as part of this wire fraud scheme, he owes restitution to the SBA for loans funded by Bank 1 in the amount of $2,337,615.

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

Date: 4/27/26 By: ______________________
AIMEE C. JIMENEZ
ASSISTANT UNITED STATES ATTORNEY

Date: 12/15/2025 By: ______________________ 4/27/26
DAVID TARRAS, ESQ.
ATTORNEY FOR THE DEFENDANT

Date: 12/17/2025 By: ______________________ 4/27/26
ROODY METELUS
DEFENDANT