UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

v. CASE NO. 2:23-cr-79-TPB-NPM

TIMOTHY CRAIG JOLLOFF and
LISA ANN JOLLOFF

UNITED STATES' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO EXTEND SURRENDER DATE

The defendants, Timothy Craig Jolloff and Lisa Ann Jolloff (collectively, "the Jolloffs"), have filed a motion[1] to extend their surrender date, currently scheduled for April 23, 2025. Doc. 122. As grounds for the Jolloffs request, they assert the need "to finish getting their affairs in order as they have encountered several difficulties in doing so." *Id.* The Court should deny the Jolloffs' request based upon the ample amount of time they were afforded prior to their sentencing to arrange their affairs in contemplation of a prison sentence.

BACKGROUND

The Jolloffs were originally charged by criminal complaint on June 16, 2023. Doc. 3. The Jolloffs were then charged by indictment on July 12, 2023. Doc. 27. Almost a year later, the Jolloffs entered guilty pleas on April 24,

[1] The motion references Local Rule numbers that are not applicable to the Middle District of Florida.

2024. Docs. 79 and 83. The Court then scheduled the sentencing hearing for August 23, 2024. Doc. 90.

Unopposed by the United States, the Jolloffs requested a continuance of the sentencing hearing to allow for medical records to be collected for the presentence investigation. Doc. 91. The sentencing was then continued to October 21, 2024. Doc. 93. The initial presentence reports were made available to the Jolloffs on September 18, 2024. Docs. 98, 99.

On October 3, 2024, the sentencing hearing scheduled for October 21, 2024, was rescheduled to December 12, 2024. Doc. 100. On November 13, 2024, the sentencing hearing scheduled for October 21, 2024, was rescheduled to January 17, 2025. Doc. 101. The final presentence reports were filed on January 8 (Timothy Jolloff) and 9 (Lisa Ann Jolloff), 2025. Docs. 102, 104.

On January 9, 2025, unopposed by the United States, the Jolloffs requested a continuance of the sentencing hearing from January 17, 2025. Doc. 106. The sentencing was continued to February 14, 2025. Doc. 108.

On February 14, 2025, the Court commenced the sentencing hearing for the Jolloffs. Doc. 112. Following an exchange between Defendant Lisa Ann Jolloff and the Court, the Court continued the sentencing hearing to April 17, 2025. Doc. 113. The Court then rescheduled the sentencing hearing to April 10, 2025. Doc. 115.

On April 10, 2025, the Court sentenced the Jolloffs to terms of incarceration – 36 months for Lisa Ann Jolloff and 97 months for Timothy Jolloff. Doc. 117. The Court granted self-surrender to the Jolloffs on April 23, 2025, at the Federal Detention Center in Miami, Florida. *Id.*

On April 17, 2025, the Jolloffs requested an extension of their self-surrender date to May 23, 2025. Doc. 91.

ARGUMENT

The Jolloffs request for an extension of their self-surrender date for an additional month due to difficulties in getting their affairs in order fails to explain what difficulties they are having and why it necessitates that both of the Jolloffs extend their surrender dates. The Jolloffs have been aware of the likelihood of their incarceration since the issuance of the initial presentence report in September 2024. In early January, following the issuance of the final presentence reports, the guideline range for the Jolloffs contemplated several years of incarceration. The Jolloffs had many months to arrange their affairs prior to each of their scheduled sentencing hearings. It is unknown what the Jolloffs did to prepare for that eventuality.

The Jolloffs final presentence reports, Docs. 102, 104, do not reflect a complicated set of life circumstances for the Jolloffs. The Jolloffs were renting a home in Fort Myers, had purchased a car in 2023 during the pendency of the

case and were employed at a mobile home sales business. The Jolloffs reported no other active business concerns, family concerns involving minor children or medical appointments. The Jolloffs had also claimed they had sold the assets they acquired with the fraudulent proceeds they obtained. ¶ 142, Doc. 102. The Jolloffs had numerous liens and judgments levied against them. *Id.* at ¶ 143. The Jolloffs bankruptcy filing was previously withdrawn. *Id.* at ¶ 144. While the Jolloffs acknowledged that they had not filed taxes since 2019, there was no indication that they planned to do so. *Id.* at ¶ 145. The Jolloffs have a life insurance policy with no cash surrender value. *Id.* at 147. The Jolloffs own a storage building in Indiana, but during the sentencing hearing Timothy Jolloff claimed that there was little to no equity in the property.

The Jolloffs' request does not indicate what affairs they are having difficulty arranging, but in light of the presentence report, and the substantial amount of fraud they have already committed, it is likely they do not have any. Moreover, there is no indication in the request why it would take both of the Jolloffs to get their affairs in order, if that is even possible.

CONCLUSION

The United States respectfully requests that the Court deny the Jolloffs' motion for extension of time to self-surrender.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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