UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-CR-60155-ROSENBERG

UNITED STATES OF AMERICA

vs.

JENNIFER PAMELA IZZO,

Defendant.
_______________________________/

FACTUAL PROFFER

The United States of America (the "United States"), JENNIFER PAMELA IZZO (the "Defendant"), and his undersigned counsel agree that, were this case to proceed to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Southern District of Florida and elsewhere:

1. Company 1 is a commercial trucking fleet maintenance and repair company, owned by "E.G." and "R.G.," based in Fort Lauderdale, Florida.

2. In or around August 2019, E.G. hired the Defendant to be the financial bookkeeper for Company 1. Among her duties and responsibilities, the Defendant oversaw the repayment of vendor invoices, maintained accounts payable, and managed the balances and payments made using the company's credit cards—including the American Express and JPMorgan Chase credit cards issued in the names of individual employees (such as E.G. and R.G.).

3. In or around October 2019, the Defendant knowingly and intentionally devised an embezzlement scheme to defraud Company 1, including by creating fictitious vendor accounts, in order to make repeated and continuous unauthorized credit card transactions for her own financial benefit, all while concealing the true nature of the fictitious vendor accounts, which she controlled.

4. Namely, the Defendant created two fictitious vendor accounts through PayPal and Intuit, respectively, under the names of two real vendors with which Company 1 did business—to make her subsequent unauthorized payments falsely appear as legitimate transactions. In forming the two fictitious accounts, the Defendant undertook additional steps to conceal her involvement, including by using the names of relatives as the "owners" of the fictitious accounts, and by using newly created email addresses (as authentication addresses) in the names of the real vendors. And because American Express and JPMorgan Chase's payments are routed through servers hosted in other states, all of the Defendant's unauthorized payments caused wire transmissions from the Southern District of Florida to outside the State of Florida. Thereafter, once the payments were completed, the Defendant transmitted the fraudulently obtained funds into the personal bank account belonging to her boyfriend. Finally, the Defendant re-routed the funds through Venmo—money transfer application—from that bank account to her own personal checking account.

5. For example, on or about October 17, 2019, the Defendant made an unauthorized payment in the approximate amount of $125 to her fictitious PayPal account (ending in 8422), using the JPMorgan Chase credit card number (ending in 5167), issued in the name of R.G. During a subsequent law enforcement interview, E.G. confirmed that the Defendant did not have permission to use the names or credit cards issued in the names of other employees (including R.G.), in order to make payments to the fictitious accounts.

6. In sum, from in or around October 2019, through in or around April 2020—when she was terminated from Company 1—the Defendant carried out dozens of unauthorized credit card transactions, totaling approximately $94,500 in embezzled funds, which the Defendant ultimately received for her own personal use and benefit.

7. In or around March 2020, at the start of the COVID-19 pandemic, the Defendant

also knowingly and intentionally misused her position as Company 1's bookkeeper in a failed attempt to embezzle additional funds through the fraudulent submission of an Economic Injury Disaster Loan ("EIDL") to the Small Business Association ("SBA").

8. On or about March 30, 2020, after E.G. asked the Defendant to submit an EIDL application on behalf of Company 1, the Defendant submitted a false and fraudulent EIDL application (ending in 1014) purporting to be for Company 1, but listing the Defendant's own bank information as the recipient account. Although the application was denied, if funded, the SBA would have disbursed approximately $150,000 of COVID-19 assistance funds to the Defendant's personal bank account, instead of to Company 1. And since the SBA's EIDL approval servers are hosted in other states, the Defendant's false and fraudulent EIDL application caused a wire transmission from the Southern District of Florida to outside of the State of Florida.

9. The parties agree that these facts, which do not include all facts known to the United States and the Defendant, are sufficient to prove the charges in the Indictment beyond a reasonable doubt.

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

Date: 12/19/2022 By: ______________________
EDUARDO GARDEA, JR.
ASSISTANT UNITED STATES ATTORNEY

Date: 12/14/2022 By: ______________________
AISHA NASH, ESQ.
ATTORNEY FOR DEFENDANT

Date: 11/15/22 By: ______________________
JENNIFER PAMELA IZZO
DEFENDANT