UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-20178-CR-ALTMAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN MENDOZA,

Defendant.

_________________________________/

FACTUAL PROFFER

Defendant CHRISTIAN MENDOZA ("the Defendant" or "CHRISTIAN MENDOZA"), his counsel, and the United States of America agree that, had this case proceeded to trial, the United States would have proven the following facts, which are all true, beyond a reasonable doubt:

The United States Small Business Administration ("SBA") was an executive branch agency of the United States government that provided support to entrepreneurs and small businesses. As part of this effort, the SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans had government-backed guarantees.

The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of business owners who were suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of forgivable loans to small businesses, including sole proprietorships, for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program ("PPP"). PPP loan proceeds were required to be used by the business on certain permissible expenses—payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on these expense items within a designated period of time and used a defined portion of the PPP loan proceeds on payroll costs.

Beginning sometime in March 2020, GUILLERMO LOPEZ CARRAZANA, CHRISTIAN MENDOZA, and MAX ALBERTO MERA ULLOA, submitted and caused the submission of false and fraudulent PPP loan applications, on behalf of themselves and corporate entities that they controlled, such as G LUX LLC, Global Tax, CM Logistics, and Max Mera Corporation. LOPEZ CARRAZANA, MENDOZA, and MERA ULLOA, in return for the payment of kickbacks, also submitted and caused the submission of false and fraudulent PPP loan applications for other borrowers, including O.S., S.M, E.C., and A.A. In some instances, LOPEZ CARRAZANA and MENDOZA submitted and caused the submission of both first draw and second draw PPP loan applications on behalf of themselves and co-conspirators.

In furtherance of the scheme, LOPEZ CARRAZANA, MENDOZA, and MERA ULLOA, submitted and caused the submission of, false and fraudulent information and documentation in support of PPP loan applications, including falsified Internal Revenue Service ("IRS") forms, false and fraudulent bank records, and other documents, that falsely and fraudulently represented the monthly payroll and the number of employees for the corporate entities they controlled.

In furtherance of the scheme, LOPEZ CARRAZANA, MENDOZA, and MERA ULLOA, submitted and caused the submission of approximately 165 false and fraudulent PPP loan applications for their corporations and other borrowers' corporations. As a result of the false and fraudulent PPP loan applications submitted as part of this scheme, Lenders approved PPP loans to entities belonging to the defendants and their co-conspirators and disbursed, via interstate wire transmission, over $6,500,000 in loan proceeds into bank accounts controlled by the defendants' and their co-conspirators.

As far as loan losses attributed to each Defendant, MERA ULLOA and MENDOZA referred separate groups of borrows to LOPEZ CARRAZANA, in exchange for a share of kickbacks from each respective borrowers' PPP loan proceeds. MENDOZA and MERA ULLOA received unlawful kickbacks from borrowers' PPP loan proceeds and shared those proceeds with LOPEZ CARRAZANA. MENDOZA (with LOPEZ CARRAZANA) caused approximately $2,406,519 in fraud-based loans and MERA ULLOA (with LOPEZ CARRAZANA) caused approximately $2,384,105 in fraud-based loans. LOPEZ CARRAZANA, with each of his two co-Defendants, caused approximately $5,948,423 in fraud-based loans.

LOPEZ CARRAZANA, MENDOZA, and MERA ULLOA, and their co-conspirators, including O.S., S.M, E.C., and A.A, used the proceeds from the scheme to enrich themselves and others, and to further the scheme. The three co-Defendants did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other, O.S., S.M, E.C., A.A., and others, to knowingly, and with the intent to defraud, devise, and intend to devise, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, knowing that the pretenses, representations, and promises were false and fraudulent when made, and, for the purpose of executing the scheme and artifice, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343, all in violation of Title 18, United States Code, Section 1349.

The Parties agree that the above facts, which do not include all the facts known to the Government or Defendant, are sufficient to prove the guilt of the Defendant with respect to Count 1.

DATE: 8/18/25 BY: ______________________
ROGER CRUZ
ASSISTANT UNITED SATES ATTORNEY

DATE: 8/18/25 BY: ______________________
ARUN GOPAL RAVINDRAN
COUNSEL FOR DEFENDANT

DATE: 8/18/25 BY: X ______________________
CHRISTIAN MENDOZA
DEFENDANT