UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

22-60155-CR-ROSENBERG/STRAUSS
CASE NO. ______________

18 U.S.C. § 1343
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

vs.

JENNIFER PAMELA IZZO,

Defendant.
______________________________/

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. Company 1 was a vehicle maintenance and repair company, servicing corporate vehicle fleets such as automobiles, trucks, buses, and heavy equipment, and was located in Broward County, Florida.

2. Defendant **JENNIFER PAMELA IZZO**, a resident of Broward County, Florida, was employed by Company 1 as a financial bookkeeper and accounts payable clerk.

COUNTS 1-7
Wire Fraud
(18 U.S.C. § 1343)

1. Paragraphs 1 and 2 of the General Allegations section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around October 2019, through in or around April 2020, in Broward County, in the Southern District of Florida, and elsewhere, the defendant

JENNIFER PAMELA IZZO,

did 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 communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Sections 1343 and 2.

PURPOSE OF THE SCHEME AND ARTIFICE

3. It was the purpose of the scheme and artifice for **JENNIFER PAMELA IZZO** to unlawfully enrich herself by using her position at Company 1 to conduct fraudulent transactions purportedly on behalf of Company 1, but in truth for her own use and the use and benefit of others, including by: (a) making unauthorized electronic payments using credit card account numbers issued to Company 1's employees; (b) submitting a fraudulent loan application on behalf of Company 1; and (c) concealing her fraudulent transactions.

SCHEME AND ARTIFICE

The manner and means by which the defendant sought to accomplish the purpose of the scheme and artifice included, among other things, the following:

4. **JENNIFER PAMELA IZZO**, while employed at Company 1, created fictitious vendor accounts with PayPal and Intuit, which she controlled, in the names of real vendors of Company 1.

5. **JENNIFER PAMELA IZZO** made unauthorized payments to the fictious vendor accounts using corporate credit cards owned by Company 1 and issued in the name of Company 1 employees.

6. **JENNIFER PAMELA IZZO** transmitted and caused to be transmitted the fraud proceeds from the fictitious vendor accounts to the bank account of an accomplice, who then transferred the proceeds to personal accounts owned and controlled by **IZZO**.

7. **JENNIFER PAMELA IZZO** transmitted and caused to be transmitted through interstate wire communications an Economic Injury Disaster Loan application on behalf Company 1 that falsely and fraudulently listed **IZZO's** personal bank account as the account to receive the loan proceeds.

8. **JENNIFER PAMELA IZZO** used the proceeds from the fraud scheme for her own use and benefit, the use and benefit of others, and to further the fraud.

USE OF WIRES

9. On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant, **JENNIFER PAMELA IZZO**, for the purpose of executing and in furtherance of the aforesaid 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, did knowingly transmit and cause to be transmitted in interstate commerce, by means of wire communication, certain writings, signs, signals, pictures, and sounds, as described below:

COUNT	APPROXIMATE DATE	DESCRIPTION OF WIRE
1	October 17, 2019	Unauthorized Payment in the approximate amount of $125 to PayPal account ending in 8422 using JPMorgan Chase credit card account ending in 5167, causing a wire transmission from the Southern District of Florida to outside of Florida.
2	October 18, 2019	Unauthorized Payment in the approximate amount of $304 to PayPal account ending in 8422 using American Express credit card account ending in 4001, causing a wire transmission from the Southern District of Florida to outside of Florida.
3	November 29, 2019	Unauthorized Payment in the approximate amount of $526 to Intuit account ending in 6920 using JPMorgan Chase credit card account ending in 5167, causing a wire transmission from the Southern District of Florida to outside of Florida.
4	February 16, 2020	Unauthorized Payment in the approximate amount of $865 to Intuit account ending in 6920 using American Express credit card account ending in 2006, causing a wire transmission from the Southern District of Florida to outside of Florida.
5	March 30, 2020	Unauthorized Payment in the approximate amount of $482 to Intuit account ending in 6920 using American Express credit card account ending in 5008, causing a wire transmission from the Southern District of Florida to outside of Florida.
6	March 30, 2020	Electronic transmission of an Economic Injury Disaster Loan application ending in 1014 to the United States Small Business Administration, causing a wire transmission from the Southern District of Florida to outside of Florida.
7	April 3, 2020	Unauthorized Payment in the approximate amount of $632 to Intuit account ending in 6920 using American Express credit card account ending in 5008, causing a wire transmission from the Southern District of Florida to outside of Florida.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS 8-10
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

On or about the dates specified as to each count below, in Broward County, in the Southern District of Florida, and elsewhere, the defendant,

JENNIFER PAMELA IZZO,

during and in relation to a felony violation of Title 18, United States Code, Section 1343, that is, knowingly, and with the intent to defraud, devising, and intending 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, knowingly transmitting and causing to be transmitted, by means of wire communication in interstate commerce, certain writings, signs, signals, pictures and sounds, as charged in Counts 1, 5, and 6 of this Indictment, did knowingly transfer, possess, and use, without lawful authority, the means of identification of another person, as set forth in each count below:

COUNT	DATE	MEANS OF IDENTIFICATION
8	October 17, 2019	Name and JPMorgan Chase credit card account number ending in 5167, issued to "R.G."
9	March 30, 2020	Name and American Express credit card account number ending in 5008, issued to "E.G."
10	March 30, 2020	Name, date of birth, and social security number of "E.G."

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **JENNIFER PAMELA IZZO**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1343, as alleged in this Indictment, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and the procedures set forth in Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

EDUARDO GARDEA, JR.
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA **CASE NO.:** ______________________

v.

JENNIFER PAMELA IZZO,
______________________/

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Court Division (select one)
- ☐ Miami ☐ Key West ☐ FTP
- ☑ FTL ☐ WPB

New Defendant(s) (Yes or No) ______
Number of New Defendants ____
Total number of New Counts ____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.

3. Interpreter: (Yes or No) **No**
   List language and/or dialect: ______________________

4. This case will take **4** days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)		(Check only one)
I	☑ 0 to 5 days	☐ Petty
II	☐ 6 to 10 days	☐ Minor
III	☐ 11 to 20 days	☐ Misdemeanor
IV	☐ 21 to 60 days	☐ Felony
V	☐ 61 days and over	

6. Has this case been previously filed in this District Court? (Yes or No) **No**
   If yes, Judge ______________________ Case No. ______________________
7. Has a complaint been filed in this matter? (Yes or No) **No**
   If yes, Magistrate Case No. ______________________
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) **No**
   If yes, Judge ______________________ Case No. ______________________
9. Defendant(s) in federal custody as of ______________________
10. Defendant(s) in state custody as of ______________________
11. Rule 20 from the __________ District of ______________
12. Is this a potential death penalty case? (Yes or No) **No**
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) **No**
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) **No**

By: ______________________
EDUARDO GARDEA, JR.
Assistant United States Attorney
Court ID No. A5502663

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: **JENNIFER PAMELA IZZO**

Case No: ______________________________

Counts #: 1-7

Wire Fraud

Title 18, United States Code, Sections 1343
* **Max. Term of Imprisonment:** Twenty (20) Years
* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
* **Max. Supervised Release:** Three (3) Years
* **Max. Fine:** $250,000

Counts #: 8-10

Aggravated Identity Theft

Title 18, United States Code, 1028A(a)(1)
* **Mandatory Term of Imprisonment:** Two (2) Years
* **Max. Supervised Release:** One (1) Year
* **Max. Fine:** $250,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**