

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MICHAEL PIZARRO,
a/k/a "Eric Miller,"

Defendant.

USDC SDNY
DOCUMENT
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DOC #:
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INFORMATION

19 Cr. ____ (PAC)

19 CRIM 588

COUNT ONE
(Wire Fraud)

The United States Attorney charges:

BACKGROUND

1. At all times relevant to this Information, MICHAEL PIZARRO, a/k/a "Eric Miller," the defendant, purported to work on behalf of "National Grant," an entity PIZARRO falsely represented to be affiliated with the federal government and involved in processing government grant applications.

STATUTORY ALLEGATIONS

2. From at least in or about February 2017 up to and including on or about July 25, 2019, in the Southern District of New York and elsewhere, MICHAEL PIZARRO, a/k/a "Eric Miller," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused

JUDGE CROTHER

to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, PIZARRO, through phone calls made from Florida to New York, New York, made and caused to be made false representations to individuals that they would receive government grant funds in exchange for an application and up-front refundable application fee, whereas in truth and in fact the government grant did not exist and none of the individuals were approved for such a grant.

3. From on or about July 19, 2019 through on or about July 25, 2019, MICHAEL PIZARRO, a/k/a "Eric Miller," the defendant was on release pursuant to Title 18, United States Code, Section 3142 and an Order Setting Conditions of Release dated July 16, 2019, from the United States District Court for the Southern District of New York, which order notified PIZARRO of the potential effects of committing an offense while on pretrial release.

(Title 18, United States Code, Sections 1343, 3147, and 2.)

FORFEITURE ALLEGATIONS

4. As the result of committing the offense alleged in Count One of this Information, MICHAEL PIZARRO, a/k/a "Eric Miller," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(8), any

and all real or personal property used or intended to be used to commit, to facilitate, or to promote the commission of said offense; and any and all real or personal property constituting, derived from, or traceable to the gross proceeds that the defendant obtained directly or indirectly as a result of said offense including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

a. a black iPhone 8 Plus seized by agents with the Department of Homeland Security - Homeland Security Investigations on or about May 2, 2019.

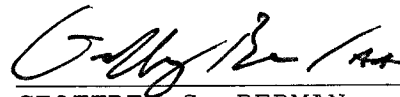
Substitute Asset Provision

5. If any of the forfeitable property described above, as a result of any act or omission of MICHAEL PIZARRO, a/k/a "Eric Miller," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which

cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to Title 21,
United States Code, Section 853(p) and Title 28, United States
Code, Section 2461(c), to seek forfeiture of any other property
of said defendant up to the value of the above forfeitable
property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

A handwritten signature in black ink, appearing to read "Geoffrey S. Berman", is written over a horizontal line.

GEOFFREY S. BERMAN
United States Attorney

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(18 U.S.C. §§ 1343, 3147, and 2.)

GEOFFREY S. BERMAN
United States Attorney.
