

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

August 10, 2022

By Ravi Subramanian, Clerk Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

JENNIFER SUAZO (a/k/a JENNIFER ESPERANZA),
Defendant.

NO. **CR22-114 TL**
INDICTMENT

The Grand Jury charges that:

COUNTS 1-5
(Bank Fraud)

1. Beginning at a time unknown but not later than October 1, 2019, and continuing through on or about April 11, 2022, in King County, within the Western District of Washington, and elsewhere, JENNIFER SUAZO (a/k/a JENNIFER ESPERANZA), and others known and unknown, knowingly devised and executed a scheme and artifice to defraud financial institutions as defined in 18 U.S.C. § 20, and to obtain monies, funds, and credits under the custody and control of the financial institutions by means of materially false and fraudulent pretenses, representations, and promises, as further and more particularly set forth below.

1 **A. *The Scheme and Artifice to Defraud***

2 2. The essence of the scheme and artifice to defraud was for SUAZO to
3 unjustly enrich herself by obtaining without authorization personally identifiable
4 information and financial instruments belonging to other individuals (the “Individual
5 Victims”); using that information and those instruments to open, take over, and
6 unlawfully access accounts at financial institutions in the Individual Victims’ names; and
7 making unauthorized transactions on and using the Individual Victims’ accounts.

8 3. The scheme and artifice to defraud resulted in at least \$107,472.66 in actual
9 losses to individual victims and financial institutions.

10 4. At all times relevant to the allegations, Bank of America, BECU, Celtic
11 Bank, First Tech Federal Credit Union, Key Bank, PNC Bank, and Synchrony Bank met
12 the definition of a financial institution set forth in 18 U.S.C. § 20 because their depository
13 accounts are insured by the Federal Deposit Insurance Corporation or the National Credit
14 Union Share Insurance Fund.

15 **B. *The Manner and Means of the Scheme and Artifice***

16 5. It was part of the scheme and artifice to defraud that SUAZO purchased and
17 obtained personally identifiable information belonging to the Individual Victims through
18 “darknet” websites such as Black Pass and through online databases such as Truthfinder.
19 SUAZO was not known by the Individual Victims, nor was she authorized by the
20 Individual Victims to possess or use their personally identifiable information. SUAZO
21 recorded this stolen information in notebooks that she kept in her personal possession.

22 6. It was further part of the scheme and artifice to defraud that SUAZO
23 fraudulently used the Individual Victims’ personally identifiable information to open
24 bank and credit card accounts in the Individual Victims’ names.

25 7. It was further part of the scheme and artifice to defraud that SUAZO took
26 over existing bank and credit card accounts belonging to the Individual Victims by
27 impersonating the Individual Victims and using their personally identifiable information
28 to authenticate access to those accounts. SUAZO then replaced the Individual Victims’

1 account details with contact information (such as phone numbers and addresses) that
2 belonged to or was otherwise associated with SUAZO.

3 8. It was further part of the scheme and artifice to defraud that, after creating
4 the fraudulent accounts and taking over existing accounts, SUAZO received mail from
5 financial institutions that was addressed to the Individual Victims both at a rented
6 mailbox to which SUAZO had access and at SUAZO's personal residence. This mail
7 included checks, credit cards, and debit cards issued in the Individual Victims' names.

8 9. It was further part of the scheme and artifice to defraud that SUAZO
9 created false identification documents (such as State of Washington driver's licenses)
10 bearing her image but the Individual Victims' names and personally identifiable
11 information. On at least one occasion, SUAZO attempted to receive mail addressed to
12 Individual Victim L.W. by presenting to a post office clerk a false identification
13 document in L.W.'s name.

14 10. It was further part of the scheme and artifice to defraud that, after creating
15 the fraudulent accounts and taking over existing accounts, SUAZO conducted
16 unauthorized transactions on those accounts, including by:

- 17 (i) issuing checks in the Individual Victims' names to others, fraudulently
18 endorsing those checks in the payee's name, and depositing those checks
19 into accounts that SUAZO controlled;
- 20 (ii) using credit cards and debit cards in the Individual Victims' names for
21 SUAZO's personal online and retail expenditures, including by making
22 cash withdrawals at automated teller machines for those expenditures; and
- 23 (iii) causing electronic payments and transfers (including wire transfers) to be
24 made from the Individual Victims' accounts into accounts controlled by
25 SUAZO or her associates.

26 11. It was further part of the scheme and artifice to defraud that SUAZO falsely
27 and fraudulently obtained stolen checks; altered or otherwise forged these checks to make
28

1 them payable to her; and deposited or attempted to deposit them into SUAZO's personal
2 bank account.

3 12. It was further part of the scheme and artifice to defraud that, in conducting
4 these unauthorized transactions, SUAZO intended to defraud the financial institutions at
5 which the Individual Victims' accounts were held by falsely representing to the financial
6 institutions that she was authorized to access the funds in and credits of those accounts,
7 resulting in a loss and a risk of loss to these financial institutions.

8 13. It was further part of the scheme and artifice to defraud that SUAZO failed
9 to repay the sums withdrawn, transferred, and used as payments for goods and services,
10 resulting in a loss and a risk of loss to the financial institutions at which the Individual
11 Victims' accounts were held.

12 ***C. Execution of the Scheme and Artifice to Defraud***

13 14. On or about the dates identified below, in King County, within the Western
14 District of Washington, and elsewhere, for the purpose of executing and attempting to
15 execute this scheme and artifice to defraud financial institutions and for the purpose of
16 carrying out and attempting to carry out this scheme and artifice to obtain monies, funds,
17 and credits under the custody and control of financial institutions by means of materially
18 false and fraudulent pretenses, representations, and promises, JENNIFER SUAZO (a/k/a
19 JENNIFER ESPERANZA) knowingly conducted and caused to be conducted the
20 following transactions and acts, with each transaction and act constituting a separate
21 Count of this Indictment:

COUNT	DATE	FINANCIAL INSTITUTION	ACT OR TRANSACTION
1	October 1, 2019	BECU	SUAZO caused \$4,500.00 to be wired from B.J.E.'s BECU account ending -2284 into A.M.'s Evolve Bank & Trust account ending -6768.
2	December 3, 2019	Bank of America	SUAZO deposited Check #5164 (drawn on B.J.E.'s BECU account ending -2284) for

1			\$480.00 into J.A.'s Bank of America checking account ending -1460.
2			
3	3	February 13, 2020	PNC Bank
4			SUAZO forged the signature of E.M. to endorse Check #7016 (drawn on J.J.'s PNC Bank account ending -0076) for \$1,400.00.
5	4	April 30, 2021	Key Bank
6			SUAZO deposited Check #3107 (drawn on K.Q. LLC's Key Bank account ending -1057) for \$1,850.00 into her personal Wells Fargo checking account ending -8495.
7			
8	5	April 7, 2022	Synchrony Bank
9			SUAZO authenticated access to L.W.'s Synchrony Bank account ending -7513 through Trust Stamp verification.
10			

11
12 All in violation of Title 18, United States Code, Sections 1344 and 2.

13 **COUNTS 6-7**

14 **(Aggravated Identity Theft)**

15 15. The Grand Jury realleges and incorporates, as if fully set forth herein,
16 paragraphs 1 through 14 of the Indictment.

17 16. On or about the dates set forth below, in King County, in the Western
18 District of Washington, JENNIFER SUAZO (a/k/a JENNIFER ESPERANZA) did
19 knowingly possess and use, without lawful authority, a means of identification of another
20 person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c),
21 to wit, bank fraud, in violation of Title 18, United States Code, Section 1344, knowing
22 that the means of identification belonged to another actual person, with each means of
23 identification constituting a separate Count of this Indictment:

24	COUNT	DATE	MEANS OF IDENTIFICATION & RELATED COUNT
25	6	December 3, 2019	J.A.'s name (Count 2)
26	7	April 7, 2022	L.W.'s name (Count 5)

27
28 All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATION

17. The allegations contained in Counts 1-5 above are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of any of the offenses alleged in Counts 1-5, JENNIFER SUAZO (a/k/a JENNIFER ESPERANZA) shall forfeit to the United States any property constituting, or derived from, proceeds Defendant obtained directly or indirectly, as a result of the offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 982(a)(2) and includes but is not limited to a sum of money reflecting the proceeds the Defendant obtained as result of the offense.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

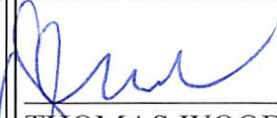
4
5 A TRUE BILL:

6 DATED: 10 August 2022
7

8 *Signature of Foreperson redacted pursuant
9 to the policy of the Judicial Conference of
10 the United States.*

11 _____
12 FOREPERSON

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14 _____
15 NICHOLAS W. BROWN
16 United States Attorney

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18 _____
19 THOMAS WOODS
20 Assistant United States Attorney

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22 _____
23 JESSICA M. LY
24 Special Assistant United States Attorney
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27
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