UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v. CASE NO: 8:26-cr-223-WFJ-AEP
18 U.S.C. § 1343
MARC VINCENT PAZIENZA 18 U.S.C. § 1519

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Wire Fraud)

At all times material to this Indictment:

A. Introduction

The Defendant and Relevant Entities

1. MARC VINCENT PAZIENZA was a resident of Pasco County, Florida. PAZIENZA was admitted to The Florida Bar in 2012 and so became eligible to practice law in Florida. In that capacity, PAZIENZA was the owner, listed president, and managing shareholder of PAZLAW PLLC ("PAZLAW").

2. Business IQ Group AI LLC ("Business IQ") was a Florida corporation registered by PAZIENZA in or around June 2023, which engaged in no legitimate business but was a shell company created by PAZIENZA to facilitate his scheme to defraud. PAZIENZA listed a trust he created—Lakeshore Regency Trust—as the manager of Business IQ and PAZLAW as the registered agent of Business IQ.

PAZIENZA opened a bank account in or around June 2023, on behalf of Business IQ at Financial Institution #1 in the Middle District of Florida. PAZIENZA was the sole signatory on the account.

3. Biotrend Analytics LLC ("Biotrend") was a Florida corporation registered by PAZIENZA in or around June 2023, which engaged in no legitimate business but was a shell company created by PAZIENZA to facilitate his scheme to defraud. PAZIENZA listed a trust he created—Enterprise Rising Trust—as the manager of Biotrend and PAZLAW as the registered agent of Biotrend. PAZIENZA opened a bank account in or around June 2023, on behalf of Biotrend at Financial Institution #1 in the Middle District of Florida. PAZIENZA was the sole signatory on the account.

4. PAZIENZA was the trustee for both Lakeshore Regency Trust and Enterprise Rising Trust, the two trusts he created as part of the scheme to defraud and listed as the managers of Business IQ and Biotrend, respectively. Both trusts received EINs from the IRS in or about June 2023.

B. <u>The Scheme and Artifice</u>

5. Beginning in or around June 2023, and continuing through at least in or around March 2025, in the Middle District of Florida and elsewhere, the defendant,

MARC VINCENT PAZIENZA,

did knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises about a material fact.

C. <u>The Manner and Means of the Scheme and Artifice</u>

6. The manner and means by which the defendant sought to accomplish the wire fraud included, among others, the following:

a. It was part of the scheme and artifice that the defendant would and did falsely represent to Individual #1 and Individual #2 that he would safeguard their funds in financial accounts and trusts he created;

b. It was further part of the scheme and artifice that the defendant would and did falsely represent to Individual #1 and Individual #2 that they would continue to control and have access to their funds in the financial accounts and trusts he created;

c. It was further part of the scheme and artifice that the defendant would and did create Lakeshore Regency Trust and Enterprise Rising Trust, naming himself as the trustee of each;

d. It was further part of the scheme and artifice that the defendant would and did create Business IQ and Biotrend as shell companies, listing Lakeshore Regency Trust and Enterprise Rising Trust, respectively, as the authorized members of those companies;

e. It was further part of the scheme and artifice that the defendant would and did open and maintain bank accounts for Business IQ and Biotrend at Financial Institution #1 to receive the funds from Individual #1 and Individual #2, and signed for the bank accounts as the companies' sole designated representative;

f. It was further part of the scheme and artifice that the defendant would and did create sham invoices for Business IQ and Biotrend, which appeared to charge Individual #1 and Individual #2 for services purportedly performed by Business IQ and Biotrend, in an effort to hide the defendant's own theft of the funds;

g. It was further part of the scheme and artifice that the defendant would and did instruct and cause Individual #1 to transmit funds via interstate wire to the bank accounts of Business IQ and Biotrend, which the defendant controlled, at Financial Institution #1;

h. It was further part of the scheme and artifice that the defendant refused to provide Individual #1 and Individual #2 access to their funds as the defendant had promised. Instead, the defendant maintained sole access to the funds, provided funds to Individual #1 and Individual #2 only at the defendant's sole discretion, and refused to return the funds to Individual #1 and Individual #2 when they requested such return;

i. It was further part of the scheme and artifice that the defendant would and did fabricate excuses for his failure to return the funds, and would and did evade Individual #1 and Individual #2 when they attempted to communicate with him about the funds;

j. It was further part of the scheme and artifice that the defendant would and did attempt to assuage Individual #1 and Individual #2's concerns about the status of their funds by making occasional purchases for them at his sole discretion, including by using the funds in the Biotrend account to purchase a vehicle in the name of Biotrend for Individual #2's use and benefit;

k. It was further part of the scheme and artifice that the defendant would and did access and use the funds provided by Individual #1 and Individual #2 for his own personal use and enjoyment without authority, instead of safeguarding those funds as he had promised;

l. It was further part of the scheme and artifice that the defendant would and did cause some of the funds to be withdrawn in cash; cause some of the funds to be transferred to other accounts he controlled; and cause some of the funds to be used for purchases of furniture, jewelry, and other items for his own personal enrichment and the enrichment of others;

m. It was further part of the scheme and artifice that the defendant would and did misrepresent, hide, conceal, and cause to be misrepresented, hidden, and concealed, acts performed in furtherance of the scheme.

D. <u>Execution of the Scheme</u>

7. On or about the date set forth below in each count, in the Middle District of Florida, and elsewhere, the defendant,

MARC VINCENT PAZIENZA,

knowingly and intentionally executed the aforesaid scheme and artifice, by transmitting and causing to be transmitted by means of wire and radio communications in interstate and foreign commerce, the writings, signs, signals, pictures, and sounds, detailed below:

COUNT	DATE	NATURE OF WIRE TRANSACTION
ONE	July 6, 2023	Defendant caused Individual #1 to transmit, via interstate wire, funds in the amount of $142,240.67 to an account at Financial Institution #1 in the name of Business IQ
TWO	July 6, 2023	Defendant caused Individual #1 to transmit, via interstate wire, funds in the amount of $178,617.80 to an account at Financial Institution #1 in the name of Biotrend

In violation of 18 U.S.C. § 1343.

COUNT THREE
(Destruction, Alteration, or Falsification of Records in a Federal Investigation)

A. Introduction

1. The allegations contained in Introduction of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

B. The Charge

2. On or about September 19, 2024, in the Middle District of Florida and elsewhere, the defendant,

MARC VINCENT PAZIENZA,

did knowingly alter, conceal, cover up, falsify, and make a false entry in a record and document with the intent to impede, obstruct, and influence the investigation and proper administration of a matter, and in contemplation of such matter, within the jurisdiction of a department and agency of the United States, namely the United States Department of Health and Human Services and its Office of Inspector General in an ongoing investigation, by creating and submitting to that investigation in response to a Grand Jury subpoena a document titled "Information for Subpoenas" on behalf of Business IQ.

In violation of 18 U.S.C. § 1519.

COUNT FOUR
(Destruction, Alteration, or Falsification of Records in a Federal Investigation)

A. Introduction

1. The allegations contained in Introduction of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

B. The Charge

2. On or about September 19, 2024, in the Middle District of Florida and elsewhere, the defendant,

MARC VINCENT PAZIENZA,

did knowingly alter, conceal, cover up, falsify, and make a false entry in a record and document with the intent to impede, obstruct, and influence the investigation and proper administration of a matter, and in contemplation of such matter, within the jurisdiction of a department and agency of the United States, namely the United

States Department of Health and Human Services and its Office of Inspector General in an ongoing investigation, by creating and submitting to that investigation in response to a Grand Jury subpoena a document titled "Information for Subpoenas" on behalf of Biotrend.

In violation of 18 U.S.C. § 1519.

FORFEITURE

1. The allegations contained in Counts One through Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1343, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. The property to be forfeited includes, but is not limited to the following:

a. an order of forfeiture in the amount of approximately $320,858.47 which represents the proceeds the defendant personally obtained from the offense;

b. a 2013 Jeep Wrangler Unlimited SP, VIN 1C4BJWDG8DL681982;

c. a 2.00 carat total weight diamond and 3.25 carat pear-shaped sapphire ring NYRDC 2127 / #1718; and

d. a ladies Rolex NYWRLX, 18K/SS Model #79173, Serial #K856806.

4. If any of the property described above, 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;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

[redacted]

Foreperson

GREGORY W. KEHOE
United States Attorney

By: Tiffany E. Fields
Tiffany E. Fields
Assistant United States Attorney

By:
for Kara M. Wick
Assistant United States Attorney
Chief, Health Care Fraud Section

FORM OBD-34
June 26

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

MARC VINCENT PAZIENZA

INDICTMENT

Violations: 18 U.S.C. § 1343
18 U.S.C. § 1519

A true bill,

[redacted]

Foreperson

Filed in open court this 23rd day

of June, 2026.

Ashley Sanders

Clerk

Bail $________________________