
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Jessica S. Allen
	:	
v.	:	Mag. No. 24-8279
	:	
JENNIFER ITURRALDE PINA,	:	CRIMINAL COMPLAINT
a/k/a "Jenni,"	:	
a/k/a "Jenni Tips"	:	

I, Special Agent Joseph Cardosi, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation for the District of New Jersey, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

s/ Joseph Cardosi

Joseph Cardosi
Special Agent
Federal Bureau of Investigation

Special Agent Joseph Cardosi attested to this Complaint by telephone pursuant to Fed. R. Crim. P. 4.1(b)(2)(A), on November 8, 2024.

HONORABLE JESSICA S. ALLEN
UNITED STATES MAGISTRATE JUDGE

s/ Jessica S. Allen

Signature of Judicial Officer

ATTACHMENT A

From on or about March 3, 2024, through on or about March 5, 2024, in Bergen County, in the District of New Jersey, and elsewhere, the defendant,

JENNIFER ITURRALDE PINA,
a/k/a “Jenni,”
a/k/a “Jenni Tips,”

in relation and in contemplation of a matter within the jurisdiction of the United States Department of Justice, including the Federal Bureau of Investigation, did knowingly alter, destroy, mutilate, conceal, and cover up a record, document, or tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of such a matter.

In violation of Title 18, United States Code, Section 1519.

ATTACHMENT B

I, Joseph Cardosi, am a Special Agent of the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Background

1. At all times relevant to this Complaint:
 - a. Defendant Jennifer Iturralde Pina, a/k/a “Jenni,” a/k/a “Jenni Tips” (“Iturralde”), resided in Franklin Lakes, New Jersey (the “Franklin Lakes Residence”).
 - b. Iturralde’s husband, Cesar Humberto Pina, a/k/a “Flipping NJ” (“Pina”), resided at the Franklin Lakes Residence with Iturralde.
 - c. Witness-1 resided in Fair Lawn, New Jersey.
 - d. Individual-1 resided in Wyckoff, New Jersey (the “Wyckoff Residence”).
 - e. Individual-2 resided at the Wyckoff Residence with Individual-1.

2. On or about October 16, 2023, Pina was charged by Complaint in this District with wire fraud, in violation of Title 18, United States Code, Section 1343. The Complaint alleges that Pina orchestrated a real estate investment fraud scheme (the “Fraud Scheme”). *See* Mag. No. 23-13255 (LDW). After his arrest, Pina was released on bond, subject to numerous conditions of release.

3. On or about February 23, 2024, Iturralde learned that Witness-1 provided certain communications related to the Fraud Scheme (the “Communications”) to the Government.

4. On or about February 25, 2024, Iturralde called Individual-1, a confidant, via an encrypted messaging application (the “Messaging Application”). Iturralde informed Individual-1 that Witness-1 provided the Communications to the Government. Iturralde asked Individual-1 to talk to Witness-1 concerning Witness-1’s supposed provision of information to the Government and instructed Individual-1 to tell Witness-1 that Iturralde was upset that Witness-1 was assisting the Government and that Witness-1 should no longer do so.

5. While on the phone with Iturralde, Individual-1 sent a message on the Messaging Application to Witness-1—with whom Individual-1 was acquainted—asking for Witness-1’s address. Witness-1 provided the address.

6. Within approximately ten minutes, Individual-1 arrived at Witness-1’s residence. Upon arriving and before having a conversation, Individual-1 immediately took Witness-1’s cellular phone out of Witness-1’s hands and placed it and Individual-1’s cellular phone on the hood of Individual-1’s vehicle to prevent a recording of their conversation. Individual-1 then walked Witness-1 to the back of the vehicle to have a conversation.

7. During their conversation, Individual-1 told Witness-1, among other things, that Witness-1 should have deleted the Communications and should not have given them to the Government. Individual-1 also instructed Witness-1 not to talk to the “feds.”

Iturralde’s Destruction of Evidence

8. While investigating Pina and Iturralde, the Government learned that Iturralde likely used multiple cellular phones, including Phone-1 and Phone-2, in furtherance of the Fraud Scheme and her effort to discourage Witness-1 from continuing to assist the Government, among other things. In or around early March 2024, the Government obtained search warrants for the Franklin Lakes Residence and for Iturralde’s person to seize and search Phone-1 and Phone-2. The Government also obtained search warrants for the Wyckoff Residence and for Individual-1’s person to seize and search Individual-1’s cellular phone.

9. On or about March 3, 2024, Iturralde and Individual-1 had the following communications via the Messaging Application:

Iturralde: Are you home

Individual-1: No

Iturralde: Can you stop by my house later I need to give you something to hold for me¹

Iturralde: Park up the street and I’ll bring it to you

...

Iturralde: Is your [family member] home

¹ Iturralde later told Individual-1 that she was attempting to drop off a cellular phone.

Individual-1: Yes

Iturralde: Ok I'm gonna bring it to [him/her] I'll explain later

Individual-1: Ok

Iturralde: Let your [family member] know I'm on my way

10. Shortly thereafter, Individual-1 had multiple calls with Individual-1's family member, Individual-2, during which Individual-1 told Individual-2 that Iturralde was going to come over to drop something off at the Wyckoff Residence. However, Individual-2 told Individual-1 to tell Iturralde not to come, which Individual-1 relayed to Iturralde. Iturralde was ultimately unable to drop off the cellular phone to Individual-1 or Individual-2.

11. Law enforcement later lawfully obtained location and other information for Phone-1 (the "Location Data"), which showed that during the time Individual-1 and Iturralde were engaged in the Messaging Applications communications on or about March 3, 2024, Phone-1 traveled from the general vicinity of the Franklin Lakes Residence to the general vicinity of the Wyckoff Residence.

12. On or about March 5, 2024, law enforcement executed the search warrants to seize Individual-1's cellular phone at the Wyckoff Residence. While Individual-1 was in law enforcement's presence, Individual-2 called Iturralde multiple times on Phone-1. At approximately 7:57 AM, Individual-2 had an approximately 60-second phone call with Iturralde, during which Individual-2 informed Iturralde that law enforcement had just seized Individual-1's cellular phone.

13. Shortly before approximately 7:59 AM, law enforcement rang the Franklin Lakes Residence doorbell to execute the search warrants to seize Phone-1 and Phone-2. In the ensuing minutes, law enforcement continued to ring the doorbell and knock on the door. After approximately three minutes, at approximately 8:02 AM, Iturralde and Pina opened the door. When law enforcement asked for Phone-1 and Phone-2, Iturralde handed over Phone-2. However, with respect to Phone-1, Iturralde said that she "broke it the other day" and that she "smashed it with a hammer" and did not "know where it went." Iturralde also showed law enforcement a chip on her countertop where she indicated that she destroyed Phone-1.

14. During a search of the Franklin Lakes residence, law enforcement was unable to locate Phone-1.

15. Among other things, the Location Data showed that Phone-1 was operational and located in the general vicinity of the Franklin Lakes Residence until shortly after approximately 7:59 AM on or about March 5, 2024, which was soon after law enforcement initially approached the door and minutes before Iturralde and Pina

opened the door for law enforcement. After approximately 7:59 AM, Phone-1 stopped communicating with its cellular network.

16. On or about March 6, 2024, a new device was registered to the phone number previously associated with Phone-1, indicating that Iturralde obtained a new cellular phone.

17. Offenses involving witness tampering, contrary to 18 U.S.C. § 1512, and wire fraud, contrary to 18 U.S.C. § 1343, are matters within the jurisdiction of the United States Department of Justice, including the Federal Bureau of Investigation, which is a department and agency of the United States.