

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PANAMA CITY DIVISION**

UNITED STATES OF AMERICA

v.

INDICMENT

**JENNIFER WOODS
and
JEFFREY CANNON**

5:21-cr-007-MEW/MJF

THE GRAND JURY CHARGES:

COUNT ONE

A. INTRODUCTION

At all times material to this Indictment:

1. Centennial Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").
2. Between approximately October 2006 and August 2019, **JENNIFER WOODS** was employed by Centennial Bank in Panama City, Florida, in a variety of roles, including as a commercial loan officer.
3. As a commercial loan officer, **JENNIFER WOODS** had access to the personal identifying information of a number of customers who used Centennial Bank for their commercial business needs. This personal identifying information

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Date 2/18/21
Shope Dai Cannon
United States Magistrate Judge

included names, dates of birth, Social Security numbers, account numbers, and copies of identification documents, including driver's licenses. These customers included E.P., J.W., K.S., S.G., B.G., T.M., B.B., and L.B.

4. In approximately 2017, **JENNIFER WOODS** began facilitating short-term, high-interest, loans to **JEFFREY CANNON** financed by private parties. Some of the parties who financed these loans were Centennial Bank customers whom **JENNIFER WOODS** personally knew because she handled their banking. **JENNIFER WOODS** would receive a commission for some of these loans when such loans were financed and moneys disseminated.

5. Centennial Bank did not authorize these type of short-term loans financed by private parties. Nevertheless, while employed at Centennial Bank, **JENNIFER WOODS** continued to facilitate such loans to **JEFFREY CANNON**.

6. Between January 1, 2017, and April 30, 2020, **JEFFREY CANNON** was the owner and operator, as well as a partner, in various businesses located in Florida. These businesses included Orange Avenue Consulting, JHC Property Holdings, Medxsurg, Academy Physicians and Recruiting, Yoga Democracy of AZ, and QC Logistics.

7. By approximately February 2018, **JEFFREY CANNON** began having financial difficulties and informed **JENNIFER WOODS** that he could not

repay some of the loans because the money was “tied-up” in pending business ventures. He also asked her for additional money to complete these ventures.

8. In July 2019, Centennial Bank discovered that **JENNIFER WOODS** created a fraudulent loan. **JENNIFER WOODS** resigned from Centennial Bank on or about August 2, 2019.

9. After leaving Centennial Bank, **JENNIFER WOODS** formed JCW Financial Services and began working as a bookkeeper for J.W. and for K.S., owner of Beachy Beach Real Estate.

B. THE CHARGE

Between on or about February 1, 2018, and on or about December 31, 2019, in the Northern District of Florida and elsewhere, the defendants,

JENNIFER WOODS
and
JEFFREY CANNON,

did knowingly and willfully combine, conspire, confederate, and agree with each other and other persons, to execute and attempt to execute a scheme to obtain moneys owned by and under the custody and control of a federally insured financial institution, namely, Centennial Bank, by means of materially false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344(2).

C. MANNER AND MEANS

It was part of this conspiracy that:

1. **JENNIFER WOODS** and **JEFFREY CANNON** embezzled and made unauthorized withdrawals from the bank accounts and lines of credit of Centennial Bank customers and began transferring this money to various bank accounts controlled by **JEFFREY CANNON**, as well as directly to creditors of **JEFFREY CANNON**.
2. **JENNIFER WOODS** and **JEFFREY CANNON** falsely made and forged documents, used fictitious collateral, and made unauthorized use of personal identifiers of real people, including E.P., J.W., K.S., S.G., B.G., T.M., B.B., L.B., and C.C., to produce fraudulent loans and commit unauthorized use of lines of credit belonging to customers at Centennial Bank for **JEFFREY CANNON's** business and personal use.
3. When Centennial Bank customers complained about unauthorized withdrawals from their accounts and lines of credit, **JENNIFER WOODS** falsely represented that these withdrawals were the result of a bank error.
4. By their conduct, **JENNIFER WOODS** and **JEFFREY CANNON** embezzled, fraudulently obtained, and attempted to fraudulently obtain approximately \$3,490,474 in monies, funds, and credits owned by and under the custody and control of Centennial Bank.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

Between on or about February 1, 2018, and on or about December 31, 2019,
in the Northern District of Florida and elsewhere, the defendants,

JENNIFER WOODS
and
JEFFREY CANNON,

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the names, social security numbers, dates of birth, and account numbers of E.P., J.W., K.S., S.G., B.G., T.M., B.B., L.B., and C.C., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), namely, conspiracy to commit bank fraud, as charged in Count One of this Indictment.

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

COUNT THREE

A. INTRODUCTION

Paragraphs A1 through A9 and C1 through C4 of Count One of this Indictment are incorporated as if fully set forth herein.

B. THE CHARGE

Between on or about February 1, 2018, and on or about December 31, 2019,
in the Northern District of Florida and elsewhere, the defendants,

JENNIFER WOODS
and
JEFFREY CANNON,

did knowingly and willfully conspire, combine, confederate, and agree with each other and other persons to commit offenses against the United States, namely: to knowingly devise, and intend to devise, a scheme to defraud and for obtaining money and property by means of material false and fraudulent pretenses, representations, and promises, and to cause wire communications to be transmitted in interstate commerce for the purpose of executing such scheme, in violation of Title 18, United States Code, Section 1343.

C. MANNER AND MEANS

It was part of this conspiracy that:

1. **JENNIFER WOODS** and **JEFFREY CANNON** used the internet and phone to embezzle and transfer unauthorized withdrawals from the bank accounts and lines of credit of Centennial Bank customers and did cause these moneys to be deposited to various bank accounts controlled by **JEFFREY CANNON**, as well as directly to creditors of **JEFFREY CANNON**.
2. **JENNIFER WOODS** and **JEFFREY CANNON** used the internet and phone to create fraudulent loans in the names of real people, and then transfer the money from these fictitious loans to various bank accounts controlled by **JEFFREY CANNON**, as well as directly to creditors of **JEFFREY CANNON**.

3. **JENNIFER WOODS** and **JEFFREY CANNON** performed acts and made statements to hide and conceal, and cause to be hidden and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

4. By their conduct, **JENNIFER WOODS** and **JEFFREY CANNON**'s scheme to defraud by use of wire communications resulted in a loss of approximately \$4,501,259 to Centennial Bank and J.W.

All in violation of Title 18, United States Code, Section 1349.

CRIMINAL FORFEITURE

The allegations contained in Counts One and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. From their engagement in the violations alleged in Counts One and Three of this Indictment, the defendants,

JENNIFER WOODS
and
JEFFREY CANNON,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), any and all of the defendant's right, title, and interest in any property, real and personal, constituting, and derived from, proceeds obtained, directly and indirectly, as a result of such violations.

If any of the property described above as being subject to forfeiture, as a result of acts or omissions of the defendants:

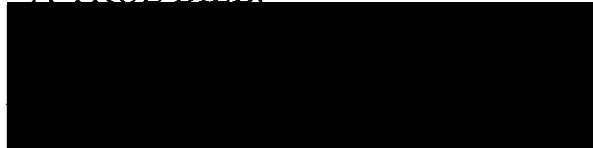
- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred, sold to, or deposited with a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.



LAWRENCE KEEFE
United States Attorney

A TRUE BILL:



FOREPERSON



AINE AHMED
Assistant United States Attorney

2/18/2021

DATE