



the names of at least thirteen Identity Theft Victims and obtained fraudulent payments totaling more than \$139,000. For example, TAYLOR submitted or caused to be submitted the fraudulent unemployment benefits claims to the state of North Carolina, as identified in the chart below:

	UI APPLICATION DATE	UI STATE	WHERE FUNDS WERE DEPOSITED	AMOUNT DEPOSITED	VICTIM
a.	6/3/2020	NC	Sutton Bank card	\$7,250.00	Z.C.
b.	5/26/2020	NC	BOA pre-paid card	\$16,224.00	J.R.
c.	6/10/2020	NC	BOA pre-paid card	\$2,850.00	A.M.
d.	5/25/2020	NC	BOA pre-paid card and Wells Fargo Acct *1588	\$15,600.00	B.B.
e.	6/15/2020	NC	BOA pre-paid card and Chime pre-paid card	\$13,450.00	B.W.
f.	6/19/2020	NC	BOA pre-paid card	\$18,900.00	Br.W
g.	6/3/2020	NC	BOA pre-paid card	\$9,648.00	K.Z.
h.	6/2/2020	NC	BOA pre-paid card	\$3,800.00	J.W.
i.	5/17/2020	NC	Sutton Bank card	\$950.00	M.M.
j.	6/14/2020	NC	BOA pre-paid card	\$20,050.00	T.K.

4. It was further part of the scheme to defraud that TAYLOR used the PII of identity theft victims to file fraudulent UI benefit claims in other states including Nevada, Arizona, Tennessee, Texas, Ohio, and Massachusetts. TAYLOR electronically submitted by interstate wire, and caused to be submitted, fraudulent unemployment benefits claims in the names of more than twenty Identity Theft Victims and obtained fraudulent payments, through interstate wires, totaling more than \$200,000. For example, TAYLOR submitted or caused to be submitted the fraudulent unemployment benefits claims to the states identified below as further identified in the chart below:

	UI APPLICATION DATE	UI STATE	WHERE FUNDS WERE DEPOSITED	AMOUNT DEPOSITED	VICTIM
a.	6/22/2020	NV	Sutton Bank card	\$3,067.00	C.D.
b.	6/27/2020	AZ	Sutton Bank card	\$10,242.00	C.T.
c.	6/27/2020	AZ	Sutton Bank card	\$9,438.00	B.R.
d.	5/7/2020	MA	Woodforest Acct *0259	\$6,736.00	S.R.

e.	5/8/2020	MA	Woodforest Acct *9863	\$4,335.00	T.F.
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5. It was further part of the scheme to defraud that, on or about January 1, 2021, TAYLOR fraudulently applied for, or caused to be applied for, an EIDL from the SBA given application number \*3299 using the name of Identity Theft Victim A.G. and a purported tutoring business using false business information.

6. It was further part of the scheme to defraud that, on or about December 23, 2020, TAYLOR fraudulently applied for an EIDL from the SBA given application number \*9930 in the name of Tristar Building Services using false business information.

7. TAYLOR, with the intent to defraud, did knowingly and intentionally devise the scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice to defraud, did cause to be transmitted by means of wire communication in interstate commerce any writing, signal, or sound for the purposes of executing said scheme and artifice.

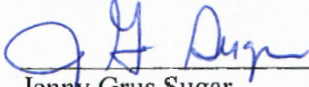
8. On or about May 17, 2020, in the Western District of North Carolina and elsewhere, TAYLOR did knowingly use, without lawful authority, a means of identification of another person, namely, M.M., during and in relation to wire fraud, knowing that the means of identification belonged to another actual person.

9. The amount of loss, actual and attempted, involved in the scheme, including relevant conduct that is known to the United States as of the date of TAYLOR's guilty plea at this was more than \$250,000.00 but less than \$550,000.00.

10. The offense involved more than ten victims.

11. The offense involved the possession or use of device-making equipment or authentication feature.

WILLIAM T. STETZER  
ACTING UNITED STATES ATTORNEY



Jenny Grus Sugar  
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Indictment, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Indictment, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.



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Brian Cromwell, Attorney for Defendant

DATED: 7/13/21