## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	
	)	DOCKET NO. 3:21cr132
V.	)	
	)	FACTUAL BASIS
KEON I, TAYLOR	)	
	)	

NOW COMES the United States of America, by and through William T. Stetzer, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

- 1. From at least March 2020 through February 2021, the Defendant, KEON I. TAYLOR ("TAYLOR"), engaged in a scheme to defraud the United States Department of Labor, the North Carolina Division of Employment Security, and the States of Tennessee, Texas, Ohio, Massachusetts, Nevada, and Arizona by filing fraudulent claims for COVID-19-related unemployment insurance (UI) benefits in the names of identity theft victims.
- 2. It was part of the scheme to defraud that TAYLOR obtained the identity information of real persons ("Identity Theft Victims"), including names, Social Security Numbers, dates of birth, and addresses, among other information (collectively, "personal identifying information" or "PII") over the Internet, and elsewhere.
- 3. It was further part of the scheme to defraud that TAYLOR used the PII of identity theft victims to file fraudulent UI benefit claims with the State of North Carolina. TAYLOR clectronically submitted or caused to be submitted fraudulent unemployment benefits claims in

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.	

- 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 asspute this Factual Basis.

Brian Crymwell, Attorney for Defendant