

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. _____
)	
v.)	COUNT ONE:
)	[both defendants]
ERIC KENDALL TAYLOR,)	18 U.S.C. § 371
[DOB: xx/xx/70])	NMT 5 years and \$250,000
)	Class D Felony
and)	NMT 3 years Supervised Release
)	
DORIS J. TAYLOR,)	COUNTS TWO through FOURTEEN:
[DOB: xx/xx/47])	[both defendants]
)	18 U.S.C. §§ 2314 and 2
Defendants.)	NMT 10 years and \$250,000
)	Class C Felony
)	NMT 3 years Supervised Release
)	
)	COUNTS FIFTEEN through TWENTY:
)	[defendant Eric Taylor]
)	18 U.S.C. §§ 1957 and 2
)	NMT 10 years and \$250,000
)	Class C Felony
)	NMT 3 years Supervised Release
)	
)	\$100 Special Assessment on each
)	count.
)	
)	Restitution may be ordered.

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

Introduction

1. At all times material herein:

a. Defendant ERIC KENDALL TAYLOR was in the business of investing in residential properties in Kansas City and Lee's Summit, Missouri. He maintained bank accounts at Missouri Central Credit Union, Lee's Summit, Missouri, and UMB Bank, Kansas City, Missouri.

b. Defendant DORIS J. TAYLOR was in business as a real estate broker under the name Doris J. Taylor Realty. She also invested in residential properties in Kansas City and Lee's Summit, Missouri.

c. C and K Co., hereafter C & K, was a business name used by defendant ERIC TAYLOR to create false second mortgages on properties and to obtain loan proceeds. It maintained a bank account in the name C and K Co. at UMB Bank, Kansas City, Missouri.

d. Pinetree Consulting, T & M Management, T & M Enterprise, and W & W Enterprise were fictitious business names used by defendant ERIC TAYLOR to create false employment and income information, documentation, and verification.

The Conspiracy and Its Object

2. Beginning in or about the summer of 1999, the exact date being unknown to the grand jury, and continuing through in or about September 23, 2005, at Kansas City and Lee's Summit, in the Western District of Missouri, and elsewhere, defendants ERIC KENDALL TAYLOR and DORIS J. TAYLOR, and others known and unknown to the grand jury, combined, confederated and agreed with each other and others known and unknown to the grand jury, to obtain money from mortgage lenders, and to retain the money obtained, by means of material false and fraudulent pretenses, representations and promises, and by the concealment of material facts, and in the execution of the said scheme to commit offenses against the United States, that is, to knowingly and willfully transport and

transfer, and cause to be transported and transferred, in interstate commerce, money of a value of \$5,000 or more, knowing the same to have been converted and taken by fraud, in violation of Title 18, United States Code, Sections 2314 and 2.

Purpose of the Conspiracy

3. The purpose of the conspiracy was to obtain money from mortgage lenders by means of material false and fraudulent representations and promises, and by the concealment of material facts, for the personal financial benefit of defendants.

Fraudulent Scheme

4. It was part of the scheme that defendants:
- a. Acquired residential properties at reduced rates;
 - b. Prepared false and fraudulent loan applications and supporting documentation for submission to mortgage lenders in the names of straw borrowers, making material false and fraudulent representations and omissions of fact therein;
 - c. Caused inflated appraisals to be prepared in relation to the properties;
 - d. Submitted false and fraudulent loan applications, appraisals, documentation, and other representations to mortgage lenders, making material false and fraudulent representations and omissions of fact therein;
 - e. Caused mortgage lenders to approve said loan applications in reliance on the material false and fraudulent representations and omissions of fact;

f. Caused mortgage lenders to send in interstate commerce loan proceeds in the form of wire transfers and checks; and

g. Obtained personal financial benefit as a result of the scheme.

Manner and Means

5. It was part of the conspiracy that, beginning in or about the summer of 1999, the exact date being unknown to the grand jury, and continuing to in or about May 2004, defendants ERIC KENDALL TAYLOR and DORIS J. TAYLOR acquired residential properties after foreclosure and at reduced prices.

6. It was further part of the conspiracy that defendants solicited and induced individuals to purchase the said real estate and obtain mortgage loans for the properties as straw borrowers from mortgage lenders; defendants also purchased properties and obtained mortgage loans in their own names.

7. It was further part of the conspiracy that defendants caused inflated appraisals to be prepared for submission in relation to the loan applications for the properties.

8. It was further part of the conspiracy that defendants prepared and caused to be prepared material false, fraudulent and misleading loan applications and documents in support of the loan applications, which were submitted to the mortgage lenders to induce the lenders to approve the applications and lend funds to the victim-investors.

9. It was further part of the conspiracy that, in reliance on the said material false, fraudulent and misleading representations and omissions contained in the mortgage loan applications, mortgage lenders approved the loans.

10. It was further part of the conspiracy that defendants caused mortgage lenders to send in interstate commerce the loan proceeds by wire transfers and checks.

11. It was further part of the conspiracy that defendants caused loan proceeds to be disbursed to defendant ERIC J. TAYLOR by representing that C & K Co., a company under his control, held mortgage liens on the properties.

12. It was further part of the conspiracy that defendants obtained personal financial benefit as a result of the scheme.

Overt Acts

13. In furtherance of and to effect the objectives of the conspiracy, and to accomplish its purposes and objectives, defendants committed and caused to be committed the following overt acts, among others, in Kansas City, in the Western District of Missouri and elsewhere:

a. During the summer of 1999, defendant ERIC TAYLOR purchased from R.W. a false Social Security number and false payroll stubs, including a false Employer Identification Number, to use to apply for mortgage loans. The false documents were mailed to defendant in Kansas City, Missouri.

b. During the summer of 1999, defendant ERIC TAYLOR purchased from R.W. false payroll stubs and W-2 forms to submit

to mortgage lenders to document the false information he planned to submit on loan applications.

c. During the summer of 1999, defendant ERIC TAYLOR obtained an agreement from R.W. to verify the false employment defendant ERIC TAYLOR planned to include in loan applications.

d. Before or about August 13, 1999, defendant ERIC TAYLOR applied for a mortgage loan from Corinthian Mortgage Corporation for \$64,468 in connection with the purchase of 1904 E. 61st Terrace, Kansas City, Missouri; defendant DORIS TAYLOR received a Selling Broker's Commission in connection with the purchase. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, a false Social Security number, false payroll stubs, and false W-2 forms.

e. Before or about July 21, 2000, defendant ERIC TAYLOR created false payroll stubs and false W-2 forms, falsely showing he was employed by a fictitious company called T & M Enterprises at a fictitious salary.

f. Before or about July 21, 2000, defendant ERIC TAYLOR applied for a mortgage loan from America's Wholesale Lender, also doing business as Countywide Home Loans, Inc., for approximately \$50,800 in connection with the purchase of 2448 Brooklyn, Kansas City, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information,

false asset information, a false Social Security number, a false payroll stub, and false W-2 forms.

g. Before or about July 21, 2000, defendant ERIC TAYLOR applied for a mortgage loan from America's Wholesale Lender, also doing business as Countywide Home Loans, Inc., for approximately \$54,400 in connection with the purchase of 6908 Brooklyn, Kansas City, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, a false Social Security number, a false payroll stub, and false W-2 forms.

h. Before or about July 21, 2000, defendant ERIC TAYLOR applied for a mortgage loan from America's Wholesale Lender, also doing business as Countywide Home Loans, Inc., for approximately \$44,000 in connection with the purchase of 4016 South Benton, Kansas City, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, a false Social Security number, a false payroll stub, and false W-2 forms.

i. Before or about July 21, 2000, defendant ERIC TAYLOR applied for a mortgage loan from America's Wholesale Lender, also doing business as Countywide Home Loans, Inc., for approximately \$46,450 in connection with the purchase of 3027 E. 32nd Street, Kansas City, Missouri. In the loan application and supporting documentation, defendant provided false information,

including false employment information, false income information, false asset information, a false Social Security number, a false payroll stub, and false W-2 forms.

j. Before or about October 20, 2000, defendant ERIC TAYLOR, in the name of L.M., applied for a mortgage loan from Corinthian Mortgage for approximately \$208,500 in connection with the purchase of 2903 SW 13th Street, Lee's Summit, Missouri; defendant DORIS TAYLOR received a Selling Broker's Commission on the purchase. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, and a false payroll stub.

k. On or about October 20, 2000, defendant ERIC TAYLOR deeded 2903 SW 13th Street, Lee's Summit, Missouri, from L.M. to himself.

l. Before or about October 31, 2000, defendant ERIC TAYLOR applied for a mortgage loan from National City Mortgage, doing business as Commonwealth United Mortgage Co., for approximately \$281,600 in connection with the refinance of 2903 SW 13th Street, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information and false income information.

m. In or about 2001, after having used and paid R.W. to verify false employment information, defendant ERIC TAYLOR arranged for and set up a business telephone line at the home of

a relative to list on loan applications as the telephone number of his employer.

n. In or about 2001, when a mortgage lender called the business telephone number listed by defendant ERIC TAYLOR on a loan application, the relative confirmed the information or took a message, notified TAYLOR, and TAYLOR returned the call or caused someone to return the call, verifying the false employment information he had listed on the loan application.

o. In or about March 2001, defendant ERIC TAYLOR began using C and K Co. to mislead lenders as to mortgage liens on properties and as to the disposition of loan proceeds.

p. Before or about March 5, 2001, defendant ERIC TAYLOR, in the name of L.M., applied for a mortgage loan from America's Wholesale Lender, also doing business as Countrywide Home Loans, Inc., for approximately \$118,750 in connection with the purchase of 109 E. Dartmouth, Kansas City, Missouri; defendant DORIS TAYLOR received a Selling Broker's Commission on the purchase. In the loan application and supporting documentation, defendant provided false information, including the identity of the borrower, false employment information, false income information, false asset information, and false W-2 forms.

q. Before or about March 14, 2001, defendant ERIC TAYLOR applied for a mortgage loan from National City Mortgage, doing business as Commonwealth United Mortgage Co., for approximately \$180,000 in connection with the refinance of 3616 Wyandotte Street, Kansas City, Missouri. In the loan application

and supporting documentation, defendant provided false information, including a false second Deed of Trust in the name of C and K Co., a false real estate sale contract, a false payoff letter purportedly from C and K Co., a false promissory note purportedly to C and K Co., false employment information, false income information, false asset information, a false Social Security number, false payroll stubs, false W-2 forms, and an inflated appraisal.

r. On or about March 19, 2001, in preparation for later fraudulently obtaining a refinance loan, defendants caused to be recorded in Jackson County, Missouri, a false second Deed of Trust, dated March 16, 2001, in the amount of \$47,750, regarding 109 E. Dartmouth, Kansas City, Missouri. The purported lender was C and K Co.

s. Before or about April 18, 2001, defendant ERIC TAYLOR applied for a mortgage loan from Washington Mutual for approximately \$161,500 in connection with the purchase of 134 NE Wood Glen Lane, Lee's Summit, Missouri; defendant DORIS TAYLOR received a Selling Broker's Commission on the purchase. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, a false Social Security number, false payroll stubs, and a false income tax return.

t. On or about May 3, 2001, in preparation for later fraudulently obtaining a refinance loan, defendant ERIC TAYLOR

caused to be recorded a false Second Deed of Trust, dated April 30, 2001, in the amount of \$70,000 regarding 134 NE Wood Glen Lane, Lee's Summit, Missouri. The purported lender was C and K Co.

u. Before or about June 6, 2001, defendant ERIC TAYLOR, in the name L.M., applied for a mortgage loan from National City Mortgage, doing business as Commonwealth United Mortgage Co., for approximately \$172,000 in connection with the refinance of a mortgage loan for 109 E. Dartmouth, Kansas City, Missouri. In the loan application and supporting documentation, defendant provided false information, including the identity of the borrower, false employment information, false income information, false asset information, false payroll stubs, false W-2 forms, and a false payoff letter for a second Deed of Trust purportedly to C and K Co.

v. Before or about July 13, 2001, defendant DORIS TAYLOR applied for a mortgage loan from First Union National Bank of Delaware for approximately \$94,500 in connection with the refinance of a mortgage loan for 1900 E. 61st Terrace, Kansas City, Missouri. In the loan application and supporting documentation, she provided false information, including false income information.

w. On or about August 30, 2001, defendant ERIC TAYLOR opened a commercial bank account at UMB Bank, Kansas City, Missouri, in the name C and K Co.

x. Before or about September 10, 2001, defendant ERIC TAYLOR applied for a mortgage loan from First Magnus Financial Corp. for approximately \$238,800 in connection with the refinance of 134 NE Wood Glen Lane, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including a false second Deed of Trust in the name of C and K Co., a false payoff letter purportedly from C and K Co., false employment information, false income information, false asset information, a false Social Security number, false payroll stubs, false W-2 forms, a false income tax return for the tax year 2000, false rental agreements, and an inflated appraisal.

y. On or about September 19, 2001, defendant ERIC TAYLOR deeded 2903 SW 13th Terrace, Lee's Summit, Missouri, to defendant DORIS TAYLOR.

z. Between on or about September 28, 2001, and December 5, 2001, defendant DORIS TAYLOR applied for, and defendant ERIC TAYLOR caused to be applied for, a mortgage loan from National City Mortgage, also doing business as Commonwealth United Mortgage Co., for approximately \$332,350 in connection with the purchase of 2903 SW 13th Street, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including false income information, false asset information, false tax returns, the misrepresentation that she had owned the property since October 2000, and an inflated appraisal.

aa. Before or about February 22, 2002, defendant ERIC TAYLOR applied for a mortgage loan from Home Loan Corp., for approximately \$155,000 in connection with the purchase of 3827 Harrison, Kansas City, Missouri; defendant DORIS TAYLOR received a Selling Broker's Commission on the purchase. In the loan application and supporting documentation, defendant provided false information, including a false real estate sale contract, false employment information, false income information, false asset information, false payroll stubs, false W-2 forms, and an inflated appraisal.

bb. On or about March 15, 2002, defendant ERIC TAYLOR, in preparation for later fraudulently obtaining funds from a refinance loan, caused to be recorded a false second Deed of Trust, dated February 26, 2002, in the amount of \$185,000 regarding 3827 Harrison, Kansas City, Missouri. The purported lender was C and K Co.

cc. Before or about April 12, 2002, defendants ERIC TAYLOR and DORIS TAYLOR, in the name of L.M., applied for, and caused to be applied for, a mortgage loan from Principal Residential Mortgage for approximately \$351,000 in connection with the purported purchase of 3827 Harrison, Kansas City, Missouri; defendant DORIS TAYLOR was the listing and selling broker. In the loan application and supporting documentation, defendants provided false information, including a false borrower, a false down payment, a false second Deed of Trust in the name of C and K Co., a false real estate sale contract, a

false lease for the property, a false payoff letter purportedly from C and K Co., false employment information, false income information, false asset information, false payroll stubs, false W-2 forms, and an inflated appraisal.

dd. Before or about July 3, 2002, defendant ERIC TAYLOR applied for a mortgage loan from Principal Residential Mortgage for approximately \$291,000 in connection with the purchase of 2408 SW Winterview Circle, Lee's Summit, Missouri; defendant DORIS TAYLOR received a Selling Broker's Commission on the purchase. In the loan application and supporting documentation, defendant provided false information, including a false real estate sale contract, false employment information, false income information, false asset information, false payroll stubs, false W-2 forms, and an inflated appraisal.

ee. Before or about September 24, 2002, defendant ERIC TAYLOR applied for a home equity line of credit from First Horizon Home Loan Corp. for approximately \$110,000, on which he drew \$70,000, in connection with the 2408 SW Winterview Circle, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including a false verification of rent or mortgage, false employment information, false verification of employment, false income information, false payroll stubs, false W-2 forms, and a false appraisal.

ff. Before or about May 21, 2003, defendants ERIC TAYLOR and DORIS TAYLOR applied for, and caused to be applied for, a mortgage loan in the name of L.M. from National City

Mortgage, doing business as Commonwealth United Mortgage Co., for approximately \$351,000 in connection with the purported purchase of 3827 Harrison, Kansas City, Missouri. In the loan application and supporting documentation, defendants provided false information, including false employment information, false income information, false asset information, false payroll stubs, false W-2 forms, and an inflated appraisal.

gg. Before or about May 21, 2003, defendant ERIC TAYLOR, in the name of L.M., applied for a mortgage loan from National City Mortgage, doing business as Commonwealth United Mortgage Co., for approximately \$199,750 in connection with the refinance of 109 E. Dartmouth, Kansas City, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, false payroll stubs, and false W-2 forms.

hh. Before or about August 23, 2003, defendant ERIC TAYLOR applied for a mortgage loan from National City Mortgage, doing business as Commonwealth United Mortgage Co., for approximately \$415,000 in connection with the refinance of the loan for 2408 SW Winterview Circle, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, false payroll stubs, false W-2 forms, false receipts for work, and a false and inflated appraisal.

ii. Before or about May 17, 2004, defendant ERIC TAYLOR, in the name of M.G., applied for a mortgage loan from People's Choice Home Loans for approximately \$449,500 in connection with the purported purchase of 2408 SW Winterview Circle, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including a false Second Deed of Trust in the name of defendant ERIC TAYLOR, a false representation that the property would be owner-occupied, and a false and inflated appraisal.

jj. Before or about September 23, 2005, defendant ERIC TAYLOR applied for two mortgage loans from First Magnus Financial Corp. for \$650,000 and \$178,000 in connection with the refinance of 713 NE De La Mar Drive, Lee's Summit, Missouri. In the loan application and supporting documentation, defendant provided false information, including false employment information, false income information, false asset information, a false representation that he had not had any loans foreclosed in the last seven years, and an inflated appraisal.

kk. Between in or about the summer of 1999 and on or about September 23, 2005, defendants caused mortgage lenders to approve approximately 23 fraudulent loans in the approximate total amount of five million one hundred fifty-eight thousand, three hundred sixty-eight dollars (\$5,158,368).

ll. The grand jury incorporates by reference as additional overt acts each of the transfers of funds set forth in Counts Two through Fourteen. The said transfers of funds were in

interstate commerce, made by lenders as a result of and in reliance on the material false fraudulent, and misleading representations and promises, and omissions of material fact, made and caused to be made by defendants to the lenders listed in Counts Two through Fourteen.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO through FOURTEEN

1. The Grand Jury incorporates by reference paragraphs one through thirteen of Count One of the Indictment as if fully set forth herein.

2. On or about the dates listed below, at Kansas City, in the Western District of Missouri, and elsewhere, in furtherance of the conspiracy and as a result of conspiracy and scheme to defraud set forth in Count One of this Indictment, defendants ERIC KENDALL TAYLOR and DORIS J. TAYLOR caused to be transferred in interstate commerce between the locations listed below and Kansas City, Missouri, and elsewhere, money of a value of \$5,000 or more, knowing at the time that the same had been obtained and taken by fraud as described in Count One, which is incorporated by reference as if fully set forth herein, all as listed below:

COUNT	DATE OF TRANSFER	PROPERTY ADDRESS	FORM OF TRANSFER
2	04/17/01	134 NE Wood Glen Lane, Lee's Summit, MO	Wire transfer of \$161,265.91 from Washington Mutual Bank, Schaumburg, IL (initiated by Washington Mutual), to American Sterling Bank, Blue Springs, MO, for credit to the account of First American Title
3	06/11/01	109 E. Dartmouth, Kansas City, MO	Cashier's checks dated June 4, 2001, in the amounts of \$172,885.78 drawn on the account of Commonwealth United at Bank One, Texas, N.A., Port Arthur, TX, payable and sent to Realty Title Co., Independence, MO, deposited to the account of Realty Title Co., Hillcrest Bank, Independence, MO
4	09/10/01	134 NE Wood Glen Lane, Lee's Summit, MO	Wire transfer of \$238,223.16 from UBS Bank, New York, NY (initiated by First Magnus Financial Corp.), to Hillcrest Bank, Overland Park, KS, then to Hillcrest Bank, Kansas City, MO, for credit to the account of Realty Title
5	12/17/01	2903 SW 13th Street, Lee's Summit, MO	Official check dated December 5, 2001, in the amount of \$331,859.19 drawn on the account of National City Mortgage at Citibank, Buffalo, NY, payable and sent to Realty Title Co., Independence, MO, deposited to the account of Realty Title Co., Hillcrest Bank, Independence, MO
6	02/22/02	3827 Harrison, Kansas City, MO	Wire transfer of \$154,691.59 from Citibank, Pittsford, NY (initiated by Home Loan Corp.), to Commerce Bank, Kansas City, MO, for credit to the account of Chicago Title

COUNT	DATE OF TRANSFER	PROPERTY ADDRESS	FORM OF TRANSFER
7	04/12/02	3827 Harrison, Kansas City, MO	Wire transfer of \$351,732.54 from Wells Fargo Bank, N.A., Des Moines, IA (initiated by Principal Residential Mortgage), to Bank of America, N.A., Kansas City, MO, for credit to the account of Old Republic Title
8	07/03/02	2408 SW Winterview Circle, Lee's Summit, MO	Wire transfer of \$295,830.92 from Wells Fargo Bank, N.A. Des Moines, IA (initiated by Principal Residential Mortgage), to Commerce Bank, Kansas City, MO, for credit to the account of Chicago Title
9	09/24/02	2408 SW Winterview Circle, Lee's Summit, MO	Wire transfer of \$70,000 from First Tennessee Bank, Memphis, TN (initiated by First Horizon Home Loan Corp.), to Hillcrest Bank, Overland Park, KS, then to Hillcrest Bank, Kansas City, MO, for credit to the account of Realty Title
10	05/22/03	109 E. Dartmouth, Kansas City, MO	Deposit of checks dated May 20, 2003, payable to Stewart Title Co., in the amounts of \$198,936.82 and \$1,108.30, drawn on the account of National City Bank at Citibank, Buffalo, NY, to the account of Stewart Title Co., at UMB Bank, Kansas City, MO
11	05/27/03	3827 Harrison, Kansas City, MO	Deposit of check dated May 23, 2003, payable to Stewart Title, in the amount of \$351,840.42, drawn on the account National City Mortgage at Citibank, Buffalo, NY, to the account of Stewart Title, at UMB Bank, Kansas City, MO

COUNT	DATE OF TRANSFER	PROPERTY ADDRESS	FORM OF TRANSFER
12	08/28/03	2408 SW Winterview Circle, Lee's Summit, MO	Deposit of check dated August 28, 2003,, in the amount of \$25,321.52, drawn on the account of First American Title, doing business as Security Land Title Co. at Commerce Bank, N.A., Independence, MO, to the account of Assured Quality Title Co. at Capital City Bank, Topeka, KS
13	05/17/04	2408 SW Winterview Circle, Lee's Summit, MO	Deposit of check dated May 20, 2004, payable to defendant ERIC TAYLOR in the amount of \$14,692.40, drawn on the account of Assured Quality Title Co. at Capital City, Bank, Topeka, KS, into the account of defendant ERIC TAYLOR at Missouri Central Credit Union, Lee's Summit, MO
14	09/23/05	713 NE De La Mar Drive, Lee's Summit, MO	Wire transfer of \$649,011.46 from Chase Bank, New York, NY (initiated by First Magnus Financial Corp.), to Central Bank, Kansas City, MO, for credit to the account of Plaza Title; and wire transfer of \$175,074.25 from Washington Mutual Bank, Coppell, TX (initiated by First Magnus Financial Corp.) to Central Bank, Kansas City, MO, for credit to the account of Plaza Title

All in violation of Title 18, United States Code, Sections 2314 and 2.

COUNTS FIFTEEN through TWENTY

1. The Grand Jury incorporates by reference paragraphs one through 13 of Count One of this Indictment as if fully set forth herein.

2. On or about the dates listed below, at Kansas City, in the Western District of Missouri, and elsewhere, defendant ERIC KENDALL TAYLOR knowingly engaged and cause to be engaged in monetary transactions, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is, drawing on funds obtained by fraud as described in Count One, which is incorporated herein by reference, which funds defendant deposited into bank accounts in his name and under his control, defendant thereafter wrote checks drawn on the said accounts, payable as described below, the banks being located in the Kansas City, Missouri, all as further described below:

COUNT	DESCRIPTION OF DEPOSIT	DESCRIPTION OF FINANCIAL TRANSACTION
15	Deposit on 09/17/01 of a check drawn on the account of Realty Title at Hillcrest Bank, payable to C and K Co. in the amount of \$69,848.47, into the account of C and K Co. at UMB Bank, Kansas City, Missouri	Check dated 09/19/01 drawn on the account of C and K Co., payable to and signed by defendant ERIC TAYLOR, in the amount of \$20,000
16	Same as Count 15	Check dated 10/01/01 drawn on the account of C and K Co., payable to and signed by defendant ERIC TAYLOR, in the amount of \$16,000
17	Same as Count 15	Check dated 11/27/01 drawn on the account of C and K Co., payable to and signed by defendant ERIC TAYLOR, in the amount of \$11,000

COUNT	DESCRIPTION OF DEPOSIT	DESCRIPTION OF FINANCIAL TRANSACTION
18	Deposit on 4/15/02 of a check drawn on the account of Old Republic Title at Bank of America, Kansas City, Missouri, payable to C and K Co. in the amount of \$187,323.20, into the account of C and K Co. at UMB Bank, Kansas City, Missouri	Check dated 04/16/02 drawn on the account of C and K Co., payable to and signed by defendant ERIC TAYLOR, in the amount of \$50,000
19	Same as Count 18	Check dated 05/07/02 drawn on the account of C and K Co., payable to and signed by defendant ERIC TAYLOR, in the amount of \$87,000
20	Same as Count 18	Check dated 05/08/02 drawn on the account of C and K Co., payable to and signed by defendant ERIC TAYLOR, in the amount of \$87,000

All in violation of Title 18, United States Code, Sections 1957 and 2.

A TRUE BILL.

/s/ Foreperson
FOREPERSON OF THE GRAND JURY

4/4/06
Date

/s/ Linda Parker Marshall
Linda Parker Marshall #24954
Assistant United States Attorney