

ORIGINAL

FILED IN OPEN COURT  
U.S.D.C. Atlanta

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James N. Hatten, Clerk  
By: Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

GUY VINCENT TAYLOR  
A/K/A GREG ANDERSON,  
JEOFFREY JENKINS,  
VAUGHN CHAMBERS, AND  
GARY SULLIVAN

Criminal Indictment

No. **1 15 - CR - 322**

THE GRAND JURY CHARGES THAT:

**Count One  
(Wire Fraud Conspiracy)**

1. On or about February 4, 2013, and continuing until at least on or about March 19, 2014, in the Northern District of Georgia, the defendants, GUY VINCENT TAYLOR, JEOFFREY JENKINS, VAUGHN CHAMBERS, and GARY SULLIVAN, did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with each other and with others known and unknown to the Grand Jury to devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses and representations, and by omission of material facts, well knowing and having reason to know that said pretenses and representations were and would be false and fraudulent when made and caused to be made and that said omissions were and would be material, and, in so doing, caused interstate wire

communications to be made in furtherance of the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1343.

### **Background**

2. The United States Internal Revenue Services (“IRS”) is tasked with, among other things, processing federal tax returns filed by citizens. The filing of tax returns and the corresponding payments owed to the United States or refunds issued by the United States to citizens may all be completed electronically through the use of interstate wire communications.

3. Individuals preparing tax filings on behalf of others may electronically file tax returns with the IRS by acquiring an Electronic Filing Identification Number (“EFIN”). EFINs are issued by the IRS. If a tax preparer files an EFIN application with the IRS and passes a suitability check, an EFIN will be issued to the tax preparer. A tax preparer needs an EFIN to electronically file tax returns on behalf of another person.

### **Manner and Means of the Conspiracy**

4. The defendants, GUY VINCENT TAYLOR, GEOFFREY JENKINS, VAUGHN CHAMBERS, and GARY SULLIVAN, orchestrated a tax refund fraud scheme through which over 2,000 fraudulent tax returns, seeking over \$2 million in fraudulent tax refunds, were filed. The fraudulent tax returns were filed using personally identifying information belonging primarily to elderly retirees and children aged 10 and younger.

5. GUY VINCENT TAYLOR filed or caused to be filed fraudulent tax returns in the names of other individuals, without the permission of those individuals. The fraudulent

tax returns were filed through income tax preparation software using multiple EFINs belonging to various tax preparers. The fraudulent tax returns directed the IRS to electronically deposit, via Automated Clearing House (“ACH”) transfer, any tax refund due to bank accounts TAYLOR opened and caused to be opened at Wells Fargo Bank, SunTrust Bank, and PNC Bank.

6. GUY VINCENT TAYLOR recruited employees at Wells Fargo Bank, SunTrust Bank, and PNC Bank to open or cause to be opened bank accounts in the names of other individuals. These bank accounts were used to receive from the United States Treasury ACH transfers of fraudulently-obtained tax refunds.

7. JEOFFREY JENKINS, an employee of Wells Fargo Bank, opened or caused to be opened bank accounts in the names of the other individuals at the direction of GUY VINCENT TAYLOR.

8. VAUGHN CHAMBERS, an employee of SunTrust Bank, opened or caused to be opened bank accounts in the names of the other individuals at the direction of GUY VINCENT TAYLOR and JEOFFREY JENKINS.

9. GARY SULLIVAN, an employee of PNC Bank, opened or caused to be opened bank accounts in the names of the other individuals at the direction of GUY VINCENT TAYLOR and JEOFFREY JENKINS.

10. Through this scheme, GUY VINCENT TAYLOR, JEOFFREY JENKINS, VAUGHN CHAMBERS, and GARY SULLIVAN, successfully caused the deposit of hundreds of fraudulently-obtained tax refunds into fraudulently-opened bank accounts.

11. GUY VINCENT TAYLOR and others unknown to the Grand Jury withdrew cash from fraudulently-opened bank accounts through ATM machines.

12. GUY VINCENT TAYLOR and others unknown to the Grand Jury purchased money orders with bank cards associated with fraudulently-opened bank accounts. TAYLOR, JEOFFREY JENKINS, and others known and unknown to the Grand Jury cashed the money orders at check cashing businesses in and around Atlanta, Georgia.

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

**Counts Two through Six  
(Wire Fraud)**

13. The factual allegations contained within paragraphs 2 through 12 are realleged and incorporated herein.

14. On or about the dates set forth in the table below, in the Northern District of Georgia, the defendant, GUY VINCENT TAYLOR, aided and abetted by others unknown to the Grand Jury, for the purpose of executing and attempting to execute the scheme and artifice described above in paragraphs 2 through 12, such scheme and artifice having been devised and intended to be devised to defraud, and for the purpose of obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, as well as by omissions of material fact, knowing and having reason to know that the pretenses, representations, promises, and omissions were and would be material, caused the following wire communications to be transmitted in interstate commerce:

<b>Count</b>	<b>Date (on or about)</b>	<b>Wire Communication</b>
2	Feb. 4, 2013	Electronic submission to the IRS of tax return in the name of G.R., using EFIN# 673473 and directing that the tax refund be directly deposited into a Wells Fargo Bank account ending in '1686, held in the name of The Lazarus Finance Group LLC, with an authorized signor of R.L.
3	Feb. 5, 2013	Electronic submission to the IRS of tax return in the name of L.M., using EFIN# 673473 and directing that the tax refund be directly deposited into a Wells Fargo Bank account ending in '1447, held in the name of The Complete Tax and Finance Group L, with an authorized signor of O.D.
4	Apr. 7, 2013	Electronic submission to the IRS of tax return in the name of J.D., using EFIN# 673473 and directing that the tax refund be directly deposited into a Wells Fargo Bank account ending in '1686, held in the name of The Lazarus Finance Group LLC, with an authorized signor of R.L.
5	Jan. 29, 2014	Electronic submission to the IRS of tax return in the name of J.C., using EFIN# 588464 and directing that the tax refund be directly deposited into a SunTrust Bank account ending in '9792, held in the name of B.M.
6	Feb. 22, 2014	Electronic submission to the IRS of tax return in the name of M.P., using EFIN# 588464 and directing that the tax refund be directly deposited into a PNC Bank account ending in '9016, held in the name of M.S.

All in violation of Title 18, United States Code, Sections 1343 and 2.

**Counts Seven through Eighteen  
(Wire Fraud)**

15. The factual allegations contained within paragraphs 2 through 12 are realleged and incorporated herein.

16. On or about the dates set forth in the table below, in the Northern District of Georgia, the defendants identified in the table below, aided and abetted by each other and

others unknown to the Grand Jury, for the purpose of executing and attempting to execute the scheme and artifice described above in paragraphs 2 through 12, such scheme and artifice having been devised and intended to be devised to defraud, and for the purpose of obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, as well as by omissions of material fact, knowing and having reason to know that the pretenses, representations, promises, and omissions were and would be material, caused the following wire communications to be transmitted in interstate commerce:

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Wire Communication</b>
7	Feb. 21, 2013	TAYLOR, JENKINS	\$1,086.10 electronic/ACH transfer issued as a tax refund for G.R., from the United States Treasury to a Wells Fargo Bank account ending in '1686, held in the name of The Lazarus Finance Group LLC, with an authorized signor of R.L.
8	Feb. 21, 2013	TAYLOR, JENKINS	\$1,841.00 electronic/ACH transfer issued as a tax refund for L.M., from the United States Treasury to a Wells Fargo Bank account ending in '1447, held in the name of The Complete Tax and Finance Group L, with an authorized signor of O.D.
9	Sep. 18, 2013	TAYLOR, JENKINS	\$645.00 electronic/ACH transfer issued as a tax refund for C.D., from the United States Treasury to a Wells Fargo Bank account ending in '6757, held in the name of R.B.
10	Dec. 12, 2013	TAYLOR, JENKINS	\$962.00 electronic/ACH transfer issued as a tax refund for J.W., from the United States Treasury to a Wells Fargo Bank account ending in '0488, held in the name of G.L.

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendants</b>	<b>Wire Communication</b>
11	Feb. 12, 2014	TAYLOR, JENKINS, CHAMBERS	\$8,277.00 electronic/ACH transfer issued as a tax refund for C.C., from the United States Treasury to a SunTrust Bank account ending in '6091, held in the name of Pierce Financial Planning, with an authorized signor of J.P.
12	Feb. 12, 2014	TAYLOR, JENKINS, CHAMBERS	\$1,110.00 electronic/ACH transfer issued as a tax refund for E.T., from the United States Treasury to a SunTrust Bank account ending in '6125, held in the name of A.M.
13	Feb. 20, 2014	TAYLOR, JENKINS, CHAMBERS	\$632.00 electronic/ACH transfer issued as a tax refund for J.C., from the United States Treasury to a SunTrust Bank account ending in '9792, held in the name of B.M.
14	Feb. 20, 2014	TAYLOR, JENKINS, CHAMBERS	\$691.00 electronic/ACH transfer issued as a tax refund for B.P., from the United States Treasury to a SunTrust Bank account ending in '6124, held in the name of T.C.
15	Feb. 20, 2014	TAYLOR, JENKINS, CHAMBERS	\$697.00 electronic/ACH transfer issued as a tax refund for E.D., from the United States Treasury to a SunTrust Bank account ending in '6132, held in the name of B.H.
16	Feb. 12, 2014	TAYLOR, JENKINS, SULLIVAN	\$3,180.00 electronic/ACH transfer issued as a tax refund for J.T., from the United States Treasury to a PNC Bank account ending in '8376, held in the name of S.W.
17	Feb. 20, 2014	TAYLOR, JENKINS, SULLIVAN	\$693.00 electronic/ACH transfer issued as a tax refund for O.M., from the United States Treasury to a PNC Bank account ending in '8245, held in the name of M.H.
18	Mar. 5, 2014	TAYLOR, JENKINS, SULLIVAN	\$695.00 electronic/ACH transfer issued as a tax refund for C.G., from the United States Treasury to a PNC Bank account ending in '9032, held in the name of G.H.

All in violation of Title 18, United States Code, Sections 1343 and 2.

**Counts Nineteen through Twenty-Five  
(Aggravated Identity Theft)**

17. On or about the dates set forth below, in the Northern District of Georgia, the defendants specified in the table below, aided and abetted by others known and unknown to the Grand Jury, did knowingly transfer, possess, and use, without lawful authority, a means of identification of other persons—specifically, those persons whose initials are listed below—during and in relation to committing the felony violation identified below:

<b>Count</b>	<b>Date (on or about)</b>	<b>Defendant(s)</b>	<b>Individual</b>	<b>Felony Violation</b>
19	Nov. 9, 2012	TAYLOR	R.L.	Wire fraud described in Count 2.
20	Feb. 4, 2013	TAYLOR	G.R.	Wire fraud described in Count 2.
21	Apr. 7, 2013	TAYLOR	J.D.	Wire fraud described in Count 4.
22	Dec. 26, 2013	TAYLOR, JENKINS	J.P.	Wire fraud described in Count 11.
23	Dec. 26, 2013	TAYLOR, JENKINS	A.M.	Wire fraud described in Count 12.
24	Dec. 26, 2013	TAYLOR, JENKINS	B.M.	Wire fraud described in Count 13.
25	Dec. 26, 2013	TAYLOR, JENKINS	T.C.	Wire fraud described in Count 14.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.



### **Forfeiture**

18. As a result of committing one or more of the wire fraud offenses alleged in Counts One through Eighteen of this Indictment, the defendants, GUY VINCENT TAYLOR, JEOFFREY JENKINS, VAUGHN CHAMBERS, and GARY SULLIVAN, shall forfeit to the United States any and all property, real and personal, which constitutes proceeds traceable to such offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

19. If, as a result of any act or omission of the defendants, GUY VINCENT TAYLOR, JEOFFREY JENKINS, VAUGHN CHAMBERS and GARY SULLIVAN, any property subject to forfeiture: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States intends, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §

981(b)(1), 18 U.S.C. § 982(b)(1), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property.

A True BILL  
John A. Horn  
FOREPERSON

JOHN A. HORN  
*United States Attorney*

Samir Kaushal  
SAMIR KAUSHAL  
*Assistant United States Attorney*  
Georgia Bar No. 935285

600 U.S. Courthouse  
75 Spring Street, S.W.  
Atlanta, GA 30303  
t/404-581-6000  
f/404-581-6181