

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

FILED
AUG 09 2024
Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

UNITED STATES OF AMERICA)

1:24-cr- 80

v.)

JUDGES

Atchley / Steger

RICKY LEE TAYLOR, JR.)

INFORMATION

The United States Attorney for the Eastern District of Tennessee charges:

COUNT ONE
Wire Fraud
(18 U.S.C. § 1343)

1. Beginning in or about April 2020, continuing through in or about at least February 2021, in the Eastern District of Tennessee and elsewhere, the defendant, RICKY LEE TAYLOR, JR., with the intent to defraud, devised and intended to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

2. It was the purpose and object of the scheme for the defendant to unjustly enrich himself by obtaining fraudulent proceeds via the Paycheck Protection Program ("PPP") under false and misleading pretenses, including by materially misrepresenting the information provided in PPP loan applications and the information provided in supporting documents and forms.

MANNER AND MEANS

3. It was part of the scheme that the defendant operated the following business entities: Potter's Wheel Trucking, LLC; Ricky Taylor Basketball, LLC; Arena of Praise; Spirit

Logistics, LLC; Reap Real Estate and Property. It was further a part of the scheme to defraud that the defendant would apply for PPP loans on behalf of these entities and in doing would provide the following fraudulent documentation in support of loan:

- a. IRS Form 940 (Employer's Annual Federal Unemployment Tax Return),
- b. IRS Form 941 (Employer's Quarterly Federal Tax Return),
- c. Employee/Revenue Reports.

These documents were fraudulent in that the reported number of employees receiving wages and the wages actually paid to employees were grossly inflated. These misrepresentations were material to the lender because they were utilized to falsely justify and inflate the "claimed monthly payroll" on the PPP Borrower Application Forms. Thus, the defendant's fraud caused the lender to approve and disburse excessive loan amounts to the defendant's bank account. In total, the defendant submitted (8) fraudulent applications and received approximately \$1,800,000 in loans, which significantly exceeded any amount to which he would have been legally entitled.

THE EXECUTION OF THE SCHEME

4. On or about February 9, 2021, in the Eastern District of Tennessee, and elsewhere, the defendant, RICKY LEE TAYLOR, JR., for the purpose of executing the scheme described above, caused to be transmitted in interstate commerce, a wire communication originating from the defendant's electronic device in the Eastern District of Tennessee, to wit, the electronic submission of a PPP loan application ("Second Draw") on behalf of Potter's Wheel Trucking LLC, to Region Bank's computer servers located outside the state of Tennessee, which resulted in the disbursement of \$437,500, which significantly exceeded any amount to

which he would have been legally entitled.

All in violation of Title 18, United States Code, Section 1343.

COUNT TWO
Tax Fraud-Tax year 2021

The United States Attorney for the Eastern District of Tennessee further charges that on or about April 18, 2022, in Eastern District of Tennessee, the defendant, RICKY LEE TAYLOR, JR., did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which TAYLOR did not believe to be true and correct as to every material matter. That is, he filed a U.S. Individual Income Tax Return, Form 1040, online with the Director, Internal Revenue Service Center, from a location in Hamilton County, Tennessee, stating that his income in 2021 was \$72,484 whereas, as he then and there knew, his actual income in 2021 had been \$1,806,201, which resulted in a tax deficiency in the amount of \$620,674.

All in violation of Title 26, United States Code, Section 7206(1).

FORFEITURE ALLEGATIONS

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2).

Pursuant to Title 18, United States Code, Section 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1343, the defendant shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The properties to be forfeited include, but are not limited to, the following:

\$942,238.85 In U.S. Currency; and

MONEY JUDGMENT:

A personal money judgment for at least \$932,853.15 in U.S. currency, which represents the minimum amount of proceeds the defendant personally obtained as a result of an offense in violation of 18 U.S.C. § 1343. If any of the property subject to forfeiture, as a result of any act or omission of a defendant,

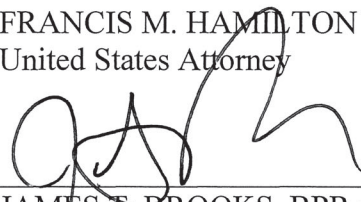
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(a)(2).

Respectfully submitted this 8th day of August 2024.

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By:


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