

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA** \* **CRIMINAL NO. 11-214**

**v.** \* **SECTION: “F”**

**BERTRAND R. TAYLOR** \*

\* \* \*

**FACTUAL BASIS**

The defendant, **BERTRAND R. TAYLOR** (hereinafter, the “defendant” or “Taylor”), has agreed to plead guilty as charged to the one-count bill of information charging him with theft of government money, in violation of Title 18, United States Code, Section 641. Should this matter proceed to trial, both the Government and the defendant, **BERTRAND R. TAYLOR**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the bill of information now pending against the defendant.

The United States Social Security Administration (“SSA”) was an agency of the United States created to provide for the general welfare by establishing a system of federal benefits. Specifically, SSA was responsible for the administration of numerous programs including, but not

limited to, SSA retirement benefits, survivors and disability insurance programs (“RSDI”), the Supplemental Security Income program for aged and disabled indigent persons (“SSI”), and Social Security Account Number issuance, reporting, and recording.

SSA was also charged with administering benefits under the Social Security Title II (“SST2”) program. SST2 benefits were paid to aged (*i.e.*, 62 years old and over), blind and disabled persons who have worked long enough in employment covered by Social Security to meet insured status requirements. Other persons, such as a spouse, a widow(er), minor children, and survivors may also be entitled to SST2 benefits.

When a recipient of SSA benefits is incapable of managing their payments for any reason, including because the recipient is a minor, the SSA may appoint someone, usually a family member, to serve as a representative payee. A representative payee is responsible for handling and taking care of the benefits. A representative payee is required to, among other things, report any and all material changes in the status or condition (*i.e.*, changes that may affect the recipient’s eligibility for benefits) of the payee whom they represent, such as the payee’s death, to SSA promptly and to return any payments to which the claimant is not entitled.

Defendant **TAYLOR**’s mother, M.T., was a SSA beneficiary who died on June 3, 1984. **TAYLOR** was the representative payee for M.T. From January 2010 to August 2010, all SST2 benefits paid to M.T. were paid to the defendant, **BERTRAND R. TAYLOR**, via Direct Debit Card through Commercial Bank. From December 2005 to December 2009, all SST2 benefits paid to M.T. were paid to the defendant, **BERTRAND R. TAYLOR**, via direct deposit to his Capital One Bank account # \*\*\*\*\*6738. Prior to December 2005, all SST2 benefits paid to M.T. were paid to the defendant, **BERTRAND R. TAYLOR**, via United States Treasury check. Copies of the Treasury

checks made payable to **TAYLOR** for M.L. and endorsed and cashed by **TAYLOR** would be offered as evidence at trial.

As representative payee for his mother, M.T., the defendant **TAYLOR** was required to report any and all material changes in the status or condition of M.T. to SSA. At no time after his mother died did defendant **TAYLOR** inform any SSA employee of M.T.'s death.

Defendant **TAYLOR** has cooperated with agents from the Social Security Administration, Office of Inspector General, since the inception of this investigation and has admitted to stealing the social security benefits he received as representative payee for his mother, M.T.

From on or about June 4, 1984 to on or about September 1, 2010 in the Eastern District of Louisiana, the defendant, **BERTRAND R. TAYLOR**, received the SST2 benefits paid by SSA to his deceased mother and used the funds for his own gain and benefit. In total, the defendant, **TAYLOR**, received SST2 benefits after M.T.'s death in the amount of \$175,184.00 to which he was not entitled.

After receiving these benefits, the defendant, **TAYLOR**, cashed, accessed and withdrew the SST2 benefits and converted them to his personal use, all the while knowing that he was not entitled to receive them. By engaging in the behavior outlined above, the defendant, **BERTRAND R. TAYLOR**, did knowingly embezzle, steal, purloin, and convert to his own use funds of the Social Security Administration to which he knew he was not entitled in the amount of approximately \$175,184.00

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, agents from the United States Social Security Administration, Office of

Inspector General, documents and records of the United States Social Security Administration, and the statements and admissions of the defendant, **BERTRAND R. TAYLOR**.

**APPROVED AND ACCEPTED:**

BERTRAND R. TAYLOR  
Defendant

Date

ROMA KENT  
Assistant Federal Defender  
Attorney for Defendant, Bertrand Taylor

Date

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JULIA K. EVANS  
Assistant United States Attorney

Date