

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION**

UNITED STATES OF AMERICA

CASE NO. 1:15CR28-MW/GRJ

vs.

SHAKAYLA NICOLE TAYLOR
_____ /

STATEMENT OF FACTS

THE UNITED STATES OF AMERICA, by and through the undersigned Assistant United States Attorney, provides this factual basis for the acceptance of the guilty plea of Defendant Shakayla Nicole Taylor. Should this case proceed to trial, the government is prepared to present evidence as follows:

On Monday, October 19, 2015, Defendant Shakayla Nicole Taylor traveled with codefendant Curtis Kennedy Williams in a Ford Mustang to a college campus in Gainesville, Florida. The purpose of this travel was to allow Williams to confront and abduct N.J., an adult female, who is the mother of Williams's child and who was attending class at the college. Taylor was aware that Williams was angry at N.J. because of issues relating to visitation with their child.

After arriving at the college campus, Williams contacted N.J. and asked her to come outside the college building. In the meantime, Taylor concealed herself in the car by lowering the driver's side seat. She waited in the driver's seat while Williams left the car to confront N.J. Taylor observed Williams begin to argue with N.J., and then begin to force her towards the passenger's side of the car. Taylor opened the passenger door of the Mustang to allow Williams to force N.J. inside the car. During this time Williams began brandishing a small caliber handgun - a Jennings Model J-22, .22 caliber semi-automatic pistol. Taylor had previously seen Williams with the handgun, but had not previously been aware that he possessed it that day.

After N.J. was forced into the vehicle, Taylor drove the car north on Interstate-75 towards her residence in the State of Louisiana. During this time, N.J. was taken against her will and repeatedly assaulted and threatened with the firearm by Williams. Taylor drove the Mustang the entire distance to Louisiana. On one occasion, Taylor stopped the car and Williams took N.J. into a wooded area. Once in the woods, Williams sexually assaulted N.J. On another occasion while in the car, Williams began arguing and threatening N.J. and Williams fired the handgun, striking the back seat.

Taylor drove Williams and N.J. to Taylor's apartment in Harvey, Louisiana. After arriving at the apartment, N.J. was forcibly taken into the apartment by Williams. On the morning of October 20, 2015, law enforcement officers began surveillance of the apartment complex where N.J. was being held. Officers observed Williams leave the apartment and begin cleaning the interior of the Mustang. The officers used this opportunity to arrest Williams.

N.J. heard the police arresting Williams, and she then fled the apartment. She ran to the police and told them what had happened. She told them Taylor remained inside the apartment and there may be a gun inside.

Officers entered the apartment and arrested Taylor. A search warrant was obtained. The firearm was located, and numerous photographs and video were taken of the apartment. Evidence included two cellular telephones, a Jennings Model J-22,.22 caliber semi-automatic pistol (recovered on the bed in plain view) serial #122396, a receipt for a food purchase from a store in Gainesville, Florida, a black cellular "flip phone," and a pair of black women's panties. Inside the car officers located a spent shell casing, and a bullet hole in the back seat.

ELEMENTS OF THE OFFENSE

Defendant Taylor is charged with violating Title 18, United States Code, Section 1201(a)(1) and 2.

It's a federal crime for anyone to kidnap, seize, confine, abduct, or carry away another person and then transport that person in interstate commerce. The Defendant can be found guilty of this crime only if all the following facts are proved beyond a reasonable doubt:

(1) the Defendant knowingly and willfully kidnapped, seized, confined, abducted, or carried away the victim, N.J.;

(2) the Defendant kidnapped, seized, confined, abducted, or carried away the victim with the intent to collect some benefit and held the victim for that reason; and

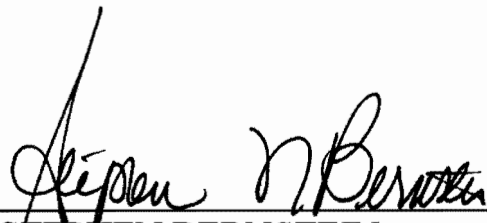
(3) the victim was willfully transported in interstate commerce while being kidnapped, seized, confined, abducted, or carried away.

To “kidnap” a person means to forcibly and unlawfully hold, keep, detain, and confine that person against the person's will. Involuntariness or coercion related to taking and keeping the victim is an essential part of the crime. The Government doesn't have to prove that the Defendant committed the kidnapping for ransom or any kind of personal financial gain. It only has to prove that the Defendant intended to gain some benefit from the kidnapping.

“Interstate commerce” means business or travel between one state and another. A person is “transported in interstate commerce” if the person is moved

from one state to another, in other words, if the person crosses a state line.

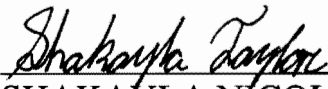
The Government does not have to prove that the Defendant knew she took the victim across a state line. It only has to prove the Defendant was intentionally transporting the victim.



STEPHEN BERNSTEIN
Attorney for Defendant

7/14/16

Date

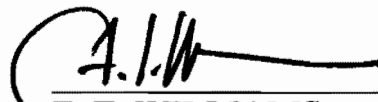


SHAKAYLA NICOLE TAYLOR
Defendant

7/14/16

Date

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