

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 13-_____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: June 6, 2013</b>
<b>DORIS TAYLOR ROTONDI,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a “D.B.,”</b>		<b>18 U.S.C. § 371 (conspiracy – 1 count)</b>
<b>a/k/a “D.W.,”</b>	<b>:</b>	<b>18 U.S.C. § 1542 (false statements in a</b>
<b>a/k/a “M.G.”</b>		<b>passport application – 6 counts)</b>
<b>JOY TAYLOR,</b>	<b>:</b>	<b>18 U.S.C. § 641 (theft of government</b>
<b>a/k/a “M.M.,”</b>		<b>funds – 1 count)</b>
<b>a/k/a “K.L.,”</b>	<b>:</b>	<b>42 U.S.C. § 1383(a)(3) (fraudulent</b>
<b>a/k/a “J.X.L.,”</b>		<b>failure to disclose income to Social</b>
<b>a/k/a “D.R.”</b>	<b>:</b>	<b>Security Administration – 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1543 (passport mutilation – 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

**BACKGROUND**

1. Prior to the issuance of a United States passport, the United States Department of State requires citizens to fill out an application for a passport. An applicant for a passport must include in her application, among other things, her name, address, social security number, date of birth, proof of United States citizenship and certain information about the applicant’s parents, including names, dates of birth, places of birth and where applicable, maiden name.

2. The applicant must sign the application after taking an oath, which was printed on the application itself, that the applicant swears, under penalty of perjury, that, among other things, the information on the application was true and correct and that the applicant had not knowingly and willfully made any false statements or included any false document in support of the application.

3. Passport applications must be in the first instance applied for in person; thereafter, they may be renewed in person or by mail.

4. Applicants were required to include two photographs of themselves with their applications.

5. Defendant DORIS TAYLOR ROTONDI, a/k/a “D.W.,” a/k/a “M.G.,” a/k/a “D.B.” is the mother of defendant JOY TAYLOR, a/k/a “M.M.,” a/k/a “K.L.,” a/k/a “J.X.L.,” a/k/a “D.R.”

6. Defendant JOY TAYLOR adopted and used the name “JOY TAYLOR” beginning in approximately her middle school years.

7. The defendants applied for and received from the Department of State United States passports in various names. Each time, they submitted the requisite two photographs of themselves.

8. Defendant DORIS TAYLOR ROTONDI lived with her daughter defendant JOY TAYLOR. The two lived together in a home they owned in Rydal, Pennsylvania, in the Eastern District of Pennsylvania. Defendant ROTONDI also had a nominal residence in a HUD-subsidized retirement home in Flourtown, Pennsylvania, at which she stayed at most a few nights each month. The defendants directed on their applications that passports be

mailed to an address on York Road, Warminster, Pennsylvania, which they falsely claimed was their home address.

9. Passports were valid for a period of 10 years from their date of issue.

10. Defendant JOY TAYLOR received an annuity or multiple payments from a former employee; defendant DORIS TAYLOR ROTONDI received an annuity or multiple payments from a source unknown to the grand jury, sent from a New York bank.

### **CONSPIRACY**

11. Beginning no later than 2010 through on or about July 11, 2012, in Rydal and elsewhere, in the Eastern District of Pennsylvania, defendants

**JOY TAYLOR,  
a/k/a "M.M.,"  
a/k/a "K.L.,"  
a/k/a "J.X.L."  
a/k/a "D.R." and  
DORIS TAYLOR ROTONDI,  
a/k/a "D.W.,"  
a/k/a "D.B.,"  
a/k/a "M.G."**

conspired and agreed together to commit offenses against the United States, that is, willfully and knowingly making false statements in applications for passports and knowingly making, uttering and possessing counterfeit checks, in violation of Title 18, United States Code, Sections 513 and 1542.

### **MANNER AND MEANS**

It was part of the conspiracy that:

12. The defendants applied for and obtained multiple fake passports in different names.

It was a further part of the conspiracy that:

13. The defendants opened accounts in different banks under false and fraudulent names and using fraudulently obtained identification documents, including for example, Pennsylvania drivers' licenses and United States passports.

14. The defendants opened bank accounts to which they were both signatories or for their joint benefit.

15. The defendants deposited checks made payable to them in their false names into these accounts.

16. To avoid notice to the government by means of currency transaction reports or reports of interest, the defendants withdrew and caused to be withdrawn the money on deposit in multiple small sums of cash.

17. To increase their assets, the defendants created counterfeit checks which appeared to be similar to legitimate checks they had received, deposited and cashed.

#### **OVERT ACTS**

1. Defendant DORIS TAYLOR ROTONDI fraudulently applied for and obtained United States passports in the names D.W., M.G. and D.B.

2. Defendant JOY TAYLOR fraudulently applied for and obtained United States passports in the names M.M., K.L., J.X.L. and D.R.

3. In or before 2005, DORIS TAYLOR ROTONDI, opened an account at Fox Chase Bank.

4. To open the account defendant DORIS TAYLOR ROTONDI used the name D.B., a false address and a social security number ending 3448, which belonged neither to

defendant ROTONDI nor to anyone named D.B.

5. On or about May 6, 2008, defendant JOY TAYLOR, using the name K.L., and a different false address than that used by defendant ROTONDI, was added to defendant ROTONDI'S account as a signatory with power of attorney on that account.

6. At all times material to this indictment, defendant JOY TAYLOR had an account at Hatboro Federal Savings, in Hatboro, Pennsylvania in the fraudulent name of "M. M."

7. To open the account defendant JOY TAYLOR presented a fraudulently obtained Pennsylvania driver's license in the name M. M., with a Hatboro address.

8. Between September 21, 2011 and October 21, 2011, at multiple branches of Hatboro Savings, defendant JOY TAYLOR withdrew in cash approximately \$40,000, in 10 transactions, none of which exceeded \$5,000.

9. Between October 24, 2011 and December 31, 2011, defendant JOY TAYLOR withdrew in cash over \$100,000 in an additional 18 transactions at four different branches of Hatboro savings, none of which was less than \$3,500 or greater than \$8,000.

10. On or about May 10, 2010, defendant JOY TAYLOR opened an account at Beneficial Bank under the false name of M. M.

11. On or about May 10, 2010, defendant JOY TAYLOR presented to Beneficial Bank as identification a fraudulently obtained passport in the name M. M., but with defendant TAYLOR's photograph.

12. On or about March 31, 2011, defendant DORIS TAYLOR ROTONDI came to Beneficial Bank and was added as a signatory to the account opened by defendant JOY

TAYLOR in the name of M. M.

13. On or about June 6, 2012, defendant JOY TAYLOR attempted to negotiate a counterfeit check at a First Federal Savings & Loan branch, in Bucks County, Pennsylvania. It appeared to be from the Bank of New York, check number 450076, and was payable to defendant DORIS TAYLOR ROTONDI in the amount of \$19,626.21. Both defendants were signatories on the account.

14. On or about July 11, 2012, the defendants possessed in the common area of their home approximately six additional counterfeit checks all payable to defendant DORIS TAYLOR ROTONDI from what appeared to be the Bank of New York in the same range of serial numbers and for the same and similar amounts of money.

15. On or about July 11, 2012, defendants, in common areas of their home, namely, on the floors of pigeon cages covered with paper, kept cash in the approximate amount of \$134,432.

16. On or about July 11, 2012, defendants maintained in common areas of their home correspondence from banks in fraudulent names used by each of the defendants.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Count One, Paragraphs 1 through 10 are incorporated here.

**APPLICATION IN THE NAME OF "M. M."**

2. On or about July 12, 2004, in Montgomery County in the Eastern District of Pennsylvania and elsewhere, defendant

**JOY TAYLOR,  
a/k/a "M.M.,"  
a/k/a "K. L.,"  
a/k/a "J. X. L.,"  
a/k/a "D. R.,"**

willfully and knowingly made false statements in an application for a United States passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that defendant TAYLOR misrepresented in her application that her name was "M.M.," that her date of birth was April 4,1955, and that her social security number ended 1672, all of which statements she knew to be false.

3. In submitting the application by mail, defendant JOY TAYLOR relied on and referred to the United States passport number ending 4961, that defendant TAYLOR had fraudulently acquired in the name of the person referred to here as "M. M." on or about September 14, 1993, after having willfully and knowingly made false statements in her application for it.

In violation of Title 18, United States Code, Section 1542.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Count One, paragraphs 1 through 10 are incorporated here.

**APPLICATION IN THE NAME OF “K. L.”**

2. On or about October 6, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

**JOY TAYLOR,  
a/k/a “M.M.,”  
a/k/a “K. L.,”  
a/k/a “J. X. L.,”  
a/k/a “D. R.”**

willfully and knowingly made false statements in an application for a United States passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that defendant TAYLOR misrepresented in her application that her name was K. L., that her date of birth was September 18, 1958, and that she had a social security number ending 0624, all of which statements she knew to be false.

3. In submitting the application by mail, defendant JOY TAYLOR relied on and referred to United States passport number ending 5703, that defendant TAYLOR had fraudulently acquired in the name of the person referred to here as “K. L.” on or about December 12, 1986, after having willfully and knowingly made false statements in her application for it.

In violation of Title 18, United States Code, Section 1542.



**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Count One, paragraphs 1 through 10 are incorporated here.

**APPLICATION IN THE NAME OF “J. X. L.”**

2. On or about July 13, 2005, in the Eastern District of Pennsylvania and elsewhere defendant

**JOY TAYLOR,  
a/k/a “M.M.,”  
a/k/a “K. L.,”  
a/k/a “J. X. L.,”  
a/k/a “D. R.”**

willfully and knowingly made false statements in an application for a United States passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that defendant TAYLOR misrepresented in her application that her name was “J. X. L.,” that her date of birth was December 3, 1957 and that her social security number ended 3891, all of which statements she knew to be false.

3. In submitting the application by mail, defendant JOY TAYLOR relied on and referred to the United States passport number ending 8611, that defendant TAYLOR had fraudulently acquired in the name of the person referred to here as “J.X.L.” on or about February 16, 1995, after having willfully and knowingly made false statements in her application for it.

In violation of Title 18, United States Code, Section 1542.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Count One, paragraphs 1 through 10 are incorporated here.

**APPLICATION IN THE NAME OF “D. R.”**

2. On or about October 20, 2010, in Montgomery County in the Eastern

District of Pennsylvania and elsewhere, defendant

**JOY TAYLOR,  
a/k/a “M.M.,”  
a/k/a “K. L.,”  
a/k/a “J. X. L.,”  
a/k/a “D. R.”**

willfully and knowingly made false statements in an application for a United States passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that defendant TAYLOR misrepresented that her name was “D.R.,” that her date of birth was October 11, 1956, and that her social security number ended 9972, all of which statements she knew to be false.

In violation of Title 18, United States Code, Section 1542.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Count One, paragraphs 1 through 10 are incorporated here.
2. On or about February 11, 2011, in Montgomery County in the Eastern

District of Pennsylvania and elsewhere, defendant

**DORIS TAYLOR ROTONDI,  
a/k/a “D.W.,”  
a/k/a “M.G.,”  
a/k/a “D.B.”**

willfully and knowingly made false statements in an application for a United States passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that defendant ROTONDI misrepresented that her name was “D. W.,” that her date of birth was September 26, 1933 and that her social security number ended 6079, all of which statements she knew to be false.

3. In submitting the application by mail, defendant DORIS TAYLOR ROTONDI relied on and referred to the United States passport number ending 1780, that defendant ROTONDI fraudulently acquired in the name of a “D. W.” on or about September 21, 1988, after having willfully and knowingly made false statements in her application for it.

In violation of Title 18, United States Code, Section 1542.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or before June 28, 2012, in Montgomery County in the Eastern District of Pennsylvania, defendant

**DORIS TAYLOR ROTONDI,  
a/k/a “D.W.,”  
a/k/a “M.G.,”  
a/k/a “D.B.,”**

willfully and knowingly mutilated and altered, and attempted to mutilate and alter, the United States passport number ending 1780, that defendant ROTONDI fraudulently acquired on or about September 21, 1988 in the name of a person known as “D. W.,” with a false date of birth of September 26, 1933 and fraudulently acquired social security number ending 6079.

2. Passport number ending 1780 was mutilated and altered to change the date of birth of the purported holder “D. W.,” and to make it appear that it had been issued September 20, 2003. In addition, a liquid substance, commonly referred to as “white out” was used to obscure the signature.

In violation of Title 18, United States Code, Section 1543.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Count One, paragraphs 1 through 10 are incorporated here.
2. On or about June 10, 2004 in Willow Grove in the Eastern District of

Pennsylvania and elsewhere defendant

**DORIS TAYLOR ROTONDI**

**a/k/a “D.W.,”**

**a/k/a “M.G.,”**

**a/k/a “D.B.”**

willfully and knowingly made false statements in an application for a United States passport with intent to induce and secure for her own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that defendant ROTONDI misrepresented that her name was “M. G.,” that her date of birth was November 16, 1939, and that her social security number ended 6033, all of which statements she knew to be false.

3. In support of her application, defendant DORIS TAYLOR ROTONDI, presented a Pennsylvania DOT identification card that defendant ROTONDI had fraudulently acquired on or about February 15, 2002, in the name of “M. G.,” but bearing a photograph of defendant ROTONDI.

In violation of Title 18, United States Code, Section 1542.

**COUNT NINE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this information:

1. The Social Security Administration (“SSA”) was an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (“SSI”) program, pursuant to title 42, United States Code, Sections 1381–1383f.

2. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, or who were “disabled” and who demonstrated financial need, as determined by his or her “income” and “resources,” as those terms were defined for purposes of the Social Security Act. Under the Act, the resource limitations for an individual receiving SSI were \$2,000.

3. On or about August 2, 2007, defendant JOY TAYLOR, a/k/a “M.M.,” a/k/a “K.L.,” a/k/a “J.X.L.,” a/k/a “D.R.,” applied for SSI benefits claiming that she was disabled.

4. Subsequent to defendant JOY TAYLOR’s application for SSI benefits using her social security number ending 2291, the SSA began paying defendant TAYLOR SSI benefits in March 2009, including a retroactive payment going back to November 2008.

5. During the period when defendant JOY TAYLOR applied for and received SSI benefit payments, she failed to disclose to the SSA that she owned a house and had substantial additional assets in her name.

6. Had defendant JOY TAYLOR truthfully disclosed her ownership of the home and her assets, defendant TAYLOR would not have qualified for SSI benefits, as her resources substantially exceeded the maximum amount allowed under the Social Security Act.

7. As a result of defendant JOY TAYLOR's fraudulent concealment of and failure to report her resources, defendant TAYLOR received SSI benefits of approximately \$8,633.46 between in or about November 2008 and in or about November 2012 to which she was not entitled.

8. Beginning in approximately November 2008 and continuing through in or about November 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

**JOY TAYLOR,  
a/k/a "M.M.,"  
a/k/a "K. L.,"  
a/k/a "J. X. L.,"  
a/k/a "D. R.,"**

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$8,633.46, in SSI benefit payments from the SSA to which she knew she was not entitled.

In violation of Title 18, United States Code, Section 641.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Count Nine, paragraphs 1 through 7 are incorporated here.
2. From in or about November 2008 and continuing through in or about

November 2012, in the Eastern District of Pennsylvania, defendant

**JOY TAYLOR,  
a/k/a "M.M.,"  
a/k/a "K. L.,"  
a/k/a "J. X. L.,"  
a/k/a "D. R.,"**

in a matter within the jurisdiction of the Social Security Administration, knowingly, willfully and with the intent to deceive and to fraudulently secure payments when no payment was authorized, concealed and failed to disclose an event affecting her initial and continued right to SSI benefit payments, in that she concealed from and failed to disclose to the Social Security Administration that she owned a home and had continuing income, as she was required to do under the Social Security Insurance benefit program.

3. Between in or about December 2010 and July 2012, defendant

**JOY TAYLOR  
a/k/a "M.M.,"  
a/k/a "K. L.,"  
a/k/a "J. X. L.,"  
a/k/a "D. R.,"**

having knowledge of the disqualifying asset limit for SSI benefits, knowingly and willfully concealed and failed to disclose to the Social Security Administration assets in excess of \$2,000,



that is, at least approximately \$219,000, and instead, fraudulently continued to receive and negotiate disability benefits, when no such benefit was due.

In violation of Title 42, United States Code § 1383(a)(3).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**