

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2018 FEB 23 PM 4:04

DEPUTY CLERK. *AA*

UNITED STATES OF AMERICA

v.

NO. 3:15-CR-409-M

LYDIA TAYLOR (5)

FACTUAL RESUME

In support of Lydia Taylor's plea of guilty to the offense in Count One of the Superseding Information, Taylor, the defendant, Selim Fiagome, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the Superseding Information, charging a violation of 18 U.S.C. § 208 that is, Participating in a Matter Affecting an Employee's Financial Interest, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant was an officer or employee of the executive branch or an independent agency of the United States;
- Second.* That the defendant participated personally and substantially in an official, governmental capacity in a matter; and
- Third.* That the defendant knew that she or another statutorily listed person or organization had a financial interest in that particular matter.

¹ *United States v. Nevers*, 7 F.3d 59, 62 (5th Cir. 1993).

STIPULATED FACTS

Beginning in or about February 2015 and continuing until in or about August 2015, in the Dallas Division of the Northern District of Texas, Defendant, Lydia Taylor, being an employee of the Department of Labor, an independent agency of the United States, knowingly participated personally and substantially as a Government officer and employee, through investigation, accessing systems, or otherwise, in matters in which Taylor knew that she, as well as an organization in which she was serving as an employee, including Union Medical Supplies and Equipment (UMSE) and Skycare Medical Supplies and Equipment (SMSE), had a financial interest.

1. Before in or around February 2015, Lydia Taylor admits that her uncle, Tshombe Anderson, and her aunt, Lydia Bankhead, jointly owned the company UMSE. UMSE's primary purpose was to bill the Department of Labor's (DOL) Office of Worker's Compensation Programs (OWCP) for durable medical equipment for worker's compensation beneficiaries. Taylor admits that her aunt, Janet Anderson, owned and operated the company SMSE. SMSE's primary purpose was also to bill the DOL's OWCP for durable medical equipment for worker's compensation beneficiaries. From in or around March 2014 through in or around August 2015, Taylor worked for both of these companies in some capacity and received money in exchange for her employment.

2. In or around January 2015, at the direction of family members, including Lydia Bankhead, Taylor sought and obtained a position as an employee of the DOL, and


ultimately worked in the OWCP. Taylor admits this is the same organization that paid claims for durable medical equipment for the companies she worked for.

3. While an employee at the DOL's OWCP, Taylor admits she accessed and reviewed active claims that were being processed and approved by the OWCP related to UMSE and SMSE. Taylor did so despite knowing her ongoing financial conflict of interest; namely, that she continued to receive money for living expenses and school tuition from UMSE and SMSE in exchange for monitoring and accessing UMSE and SMSE's active claims. Such conduct violates 18 U.S.C. § 208.


4. The defendant agrees that the defendant committed all the essential elements of the offense(s). This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the Information.

AGREED TO AND STIPULATED on this 2nd day of February, 2018.


LYDIA TAYLOR
Defendant


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