

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No.
v.)
) Violations: 18 U.S.C. §§ 1341, 1343,
) and 1346
)
REGINA TAYLOR)

COUNT ONE

The SPECIAL AUGUST 2015 GRAND JURY charges:

1. At times material to this indictment:

a. Cook County was a local government located in the Northern District of Illinois. The functions and services provided by Cook County on behalf of its residents were coordinated through various entities. One of Cook County's operational entities was the Office of the Cook County Recorder of Deeds.

b. The primary functions of the Recorder of Deeds were to accurately record, store, and maintain land records and other official documents in perpetuity for public and private use.

c. The Recorder of Deeds did not make certain real estate forms, including a Deceased Joint Tenancy Affidavit or Quit Claim Deed, available to the public.

d. Defendant REGINA TAYLOR was employed as a clerk with the Recorder of Deeds. As part of her duties as a clerk, TAYLOR provided customer service over the telephone to individuals who called into the Public Information

Department of the Recorder of Deeds. In her employment with the Recorder of Deeds, TAYLOR owed a duty of honest services to Cook County, its Recorder of Deeds, and its Citizens.

e. CW1 was an individual who, unbeknownst to defendant REGINA TAYLOR, was cooperating with law enforcement.

f. UC1 was an undercover law enforcement agent posing as the relative of CW1.

2. Beginning no later than in or about May 2012, and continuing until at least October 2012, at Cook County, in the Northern District of Illinois, Eastern Division, and elsewhere,

REGINA TAYLOR,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud and to deprive Cook County, its Recorder of Deeds, and its citizens of their right to the honest services of TAYLOR through bribery.

3. It was part of the scheme that defendant REGINA TAYLOR solicited and accepted a cash payment in exchange for preparing a fraudulent, backdated quit claim deed and agreeing to record that quit claim deed with the Recorder of Deeds.

4. It was further part of the scheme that defendant REGINA TAYLOR mailed a Deceased Joint Tenancy Affidavit to CW1, with TAYLOR's residence as the return address, after CW1 contacted the Recorder of Deeds for assistance with

adding CW1's name to the deed of CW1's deceased parents' residence at a particular address in Oak Park, Illinois, which was located in Cook County.

5. It was further part of the scheme that defendant REGINA TAYLOR directed CW1 to contact her after completing the Deceased Joint Tenancy Affidavit for the Oak Park property.

6. It was further part of the scheme that defendant REGINA TAYLOR directed CW1 and UC1 to meet her in person outside of the Recorder of Deeds offices to give her the paperwork for the Oak Park property.

7. It was further part of the scheme that defendant REGINA TAYLOR offered and agreed to prepare a false quit claim deed that added CW1 to the deed of the Oak Park property, which property was purportedly owned by three deceased individuals.

8. It was further part of the scheme that defendant REGINA TAYLOR informed UC1 that it was necessary to prepare and file the false quit claim deed in order to avoid the Cook County Probate Court, which process, TAYLOR explained, would be more expensive than the fee TAYLOR charged for her assistance.

9. It was further part of the scheme that defendant REGINA TAYLOR told UC1 that the fee for her help was \$200 and that she usually charges \$500.

10. It was further part of the scheme that defendant REGINA TAYLOR directed UC1 not to tell anyone that the individuals on the deed were deceased.

11. It was further part of the scheme that defendant REGINA TAYLOR located the property description and deed for the Oak Park property to prepare the false quit claim deed.

12. It was further part of the scheme that defendant REGINA TAYLOR prepared a fraudulent quit claim deed that was notarized, dated April 9, 2011, and purported to convey the Oak Park Property from Owner A, as grantor, to Owner A, Owner B, Owner C, and CW1, as grantees.

13. It was further part of the scheme that defendant REGINA TAYLOR prepared a fraudulent Statement by Grantor and Grantee that was notarized and dated April 9, 2011 but not executed by the Grantor or Grantee.

14. It was further part of the scheme that on or about October 23, 2012, defendant REGINA TAYLOR met with UC1 and provided UC1 with the fraudulent quit claim deed, the fraudulent Statement by Grantor and Grantee, and the legal description for the Oak Park property.

15. It was further part of the scheme that defendant REGINA TAYLOR directed UC1 to instruct CW1 to forge the signature of Owner A and to sign CW1's name on the Statement by Grantor and Grantee.

16. It was further part of the scheme that defendant REGINA TAYLOR directed UC1 to bring the fraudulent quit claim deed to the Village of Oak Park in order to have it stamped and a certificate issued.

17. It was further part of the scheme that defendant REGINA TAYLOR instructed UC1 to bring the stamped quit claim deed, certificate, and money orders for the recording fee to TAYLOR to record with the Recorder of Deeds.

18. It was further part of the scheme that on or about October 23, 2012, defendant REGINA TAYLOR accepted a \$200 bribe payment from UC1 in exchange for TAYLOR's assistance with preparing the fraudulent quit claim deed and agreeing to record the deed with the Recorder of Deeds.

19. It was further part of the scheme that defendant REGINA TAYLOR concealed, misrepresented and hid, and caused to be concealed, misrepresented and hidden, the existence and purpose of the scheme, and acts done in furtherance of the scheme.

20. On or about May 7, 2012, at Oak Park, in the Northern District of Illinois, Eastern Division, and elsewhere,

REGINA TAYLOR,

defendant, herein, for the purpose of executing the above-described scheme, knowingly caused to be delivered by the Postal Service according to the directions thereon, an envelope addressed to CW1 containing a Deceased Joint Tenancy Affidavit.

In violation of Title 18, United States Code, Sections 1341 and 1346.

COUNT TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 17, 2012, at Cook County, in the Northern District of Illinois, Eastern Division, and elsewhere,

REGINA TAYLOR,

defendant, herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce, certain signs, signals and sounds, namely, a text message to UC1 stating, "Hello, ur document r ready, on tomorrow, Thursday[.]"

In violation of Title 18, United States Code, Section 1343 and 1346.

COUNT THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

1. Paragraphs One through Nineteen of Count One are incorporated here.
2. On or about October 23, 2012, at Cook County, in the Northern District of Illinois, Eastern Division, and elsewhere,

REGINA TAYLOR,

defendant, herein, for the purpose of executing the above-described scheme, knowingly caused to be transmitted by means of a wire communication in interstate commerce, certain signs, signals and sounds, namely, a text message to UC1 stating, "My fee 200\$ I have every thing for. U."

In violation of Title 18, United States Code, Section 1343 and 1346.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY