

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff.) Cr. No. _____
)
vs.) 18 U.S.C. § 1341
) 18 U.S.C. § 2
RANDLE TAYLOR and)
CLYDE GREEN,)
)
Defendants.)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

At all times material to this information:

1. The defendant, **RANDLE TAYLOR**, was employed as a line level zone supervisor with the HVAC Division of the Memphis City Schools System. The defendant's duties, among others, included the supervision of approximately (13) thirteen HVAC technicians who performed general maintenance on all the heating and cooling systems of the Memphis City Schools.

2. Green Electric Motor Works was a business operating in Memphis, Tennessee and was a supplier of electric motors used in HVAC repairs by the Memphis City Schools System. The defendant, **CLYDE GREEN**, was the owner and operator of Green Electric Motor Works.

3. Beginning sometime in or about late 2002 an continuing until in or about December, 2004, in the Western District of Tennessee, the defendants, being aided and abetted each by the other, did knowingly devise a scheme and artifice to defraud

the Memphis City Schools System.

4. The scheme and artifice to defraud by means of false and fraudulent pretense, representations and promises was in substance as follows:

a. It was part of the scheme that the defendants, **RANDLE TAYLOR and CLYDE GREEN**, agreed to submit invoices to the Memphis City Schools System for electric motors and repairs which in fact were never provided to the Memphis City Schools System.

These invoices were mailed via the U.S. Postal Service from Green Electric Motor Works to the Memphis City School System. This in turn caused the Memphis City Schools System to mail checks payable to Green Electric Motor Works. **RANDLE TAYLOR and CLYDE GREEN** shared the proceeds from these checks.

b. As a result of the scheme and artifice to defraud, the defendants caused losses to the Memphis City Schools System of approximately \$335,610.00.

5. On or about November 30, 2004, in the Western District of Tennessee, the defendants,

-----**RANDLE TAYLOR**-----
-----**and**-----
-----**CLYDE GREEN**-----

being aided and abetted each by the other, for the purpose of executing the aforesaid scheme and artifice to defraud, knowingly caused to be sent and delivered by the U.S. Postal Service, according the directions thereon, an invoice, number 20673, for a new electric one-half horsepower blower motor, in the amount of \$180.00, to the Memphis City Schools System, Memphis, Tennessee.

All in violation of Title 18, United States Code, Section 1341 and 2.

[nmt 20 yrs.;nmt \$250,000 fine; or both; nmt 3 yrs.
supervised release together with mandatory special
assessment of \$100, see 18 U.S.C. Section § 3013(a).]

DATED: _____

UNITED STATES ATTORNEY