

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	No. 23-CR-4004
	)	
Plaintiff,	)	<u>INDICTMENT</u>
	)	
v.	)	Counts 1-26
	)	52 U.S.C. § 10307(c): False Information in
KIM PHUONG TAYLOR, also known as	)	Registering and Voting
"KIM TAYLOR"	)	
	)	Counts 27-29
Defendant.	)	52 U.S.C. § 20511(2)(A): Fraudulent
	)	Registration
	)	
	)	Counts 30-52
	)	52 U.S.C. § 20511(2)(B): Fraudulent Voting
	)	
	)	

The Grand Jury charges:

Introduction

At all relevant times to this Indictment:

1. Defendant KIM PHUONG TAYLOR (TAYLOR) was domiciled in the State of Iowa, residing in Sioux City, Iowa.
2. TAYLOR is a naturalized U.S. citizen.
3. TAYLOR has been married to PERSON A since in or about 2003.
4. Registering to vote in the state of Iowa permits a registrant to vote in all elections for both federal as well as non-federal candidates.
5. On or about June 2, 2020, a primary election was held in Woodbury County, Iowa for the purpose of selecting and electing candidates for federal, state

and local offices. Qualified voters eligible under the laws of the State of Iowa cast ballots for candidates of their preference at this election.

6. In the primary election on June 2, 2020, candidates for the President of the United States, the United States Senate and the United States House of Representatives were on the ballot in the State of Iowa, including Woodbury County, Iowa.
7. PERSON A was on the ballot for the primary election in June 2020, as a candidate for United States House of Representatives for Iowa's 4th Congressional District.
8. On or about June 2, 2020, PERSON A was defeated in the primary election.
9. On or about July 26, 2020, PERSON A registered to run for the office of Woodbury County Supervisor.
10. On or about November 3, 2020, a general election was held in Woodbury County, Iowa for the purpose of selecting and electing candidates for federal, state and local offices. Qualified voters eligible under the laws of the State of Iowa cast ballots for candidates of their preference at these elections.
11. In the general election on November 3, 2020, candidates for the President of the United States, the United States Senate and the United States House of Representatives were on the ballot in the State of Iowa, including Woodbury County, Iowa.
12. PERSON A was on the ballot for the general election in November 2020, as a candidate for Woodbury County Supervisor.

13. On or about November 3, 2020, PERSON A was elected to the Woodbury County Board of Supervisors.

The Scheme to Fraudulently Obtain and Cast Absentee Ballots

14. From in or about April 2020 through November 2020, TAYLOR perpetrated a scheme to illegally generate votes for PERSON A in support of his bid for Iowa's 4th U.S. Congressional District in the primary election on June 2, 2020, and subsequently his bid for Woodbury County Supervisor in the general election on November 3, 2020.

15. TAYLOR accomplished this through a variety of means, including by approaching residents of the Vietnamese community in Sioux City, Iowa who had limited ability to read and understand English and offering to help them vote.

16. Prior to both the primary and general elections in 2020, TAYLOR visited numerous households within the Vietnamese community in Woodbury County encouraging residents to fill out voter registration forms and absentee ballot request forms that she brought with her for each election. In some instances, TAYLOR either assisted the residents with filling out the forms or filled them out herself. TAYLOR then took the forms with her and either mailed them to the Woodbury County Auditor's Office or placed them in one of the County's drop boxes.

17. TAYLOR also signed voter registration forms and absentee ballot request forms for residents who were not present at the time or told residents who were there that they could sign the forms for their other family members.
18. Each voter registration form contained a Registrant Affidavit stating: "I swear or affirm under penalty of perjury that: I am the person named above. I am a citizen of the United States. I have not been convicted of a felony (or I have received a restoration of rights). I am at least 17 years old. I live at the address listed above. I am not currently judged by a court to be 'incompetent to vote.' I do not claim the right to vote anywhere else."
19. Each absentee ballot request form contained a Requester Affidavit stating: "I swear or affirm that I am the person named above and I am a registered voter or I am entitled to register at the address listed on this form. I am eligible to receive and vote an absentee ballot for the election indicated above."
20. Prior to both the primary and general elections in 2020, TAYLOR visited numerous households within the Vietnamese community in Woodbury County, encouraging residents to fill out the absentee ballots that they had received in the mail. In some instances, TAYLOR voted the absentee ballots and signed the accompanying affidavits for residents who were not present at the time or told residents who were there that they could sign the forms for their other family members. TAYLOR then took the ballots with her and delivered them to the Woodbury County Auditor's Office, causing

the casting of votes in the names of residents who had no knowledge of and had not consented to the casting of their ballots.

21. Each absentee ballot was accompanied by a "Voter's Affidavit" for the voter to sign stating: "I do solemnly swear or affirm by signing below that I am a qualified, registered voter in the precinct for which I requested and received this ballot. I have not voted and will not vote in any other precinct in this election, and I understand that making a false statement on this affidavit is a crime."

22. TAYLOR voted her own ballots in both the 2020 primary and general elections.

COUNTS 1-26

False Information in Registering or Voting, Aiding and Abetting

23. Paragraphs 1 through 22 are incorporated here.

24. On or about the dates listed below, in the Northern District of Iowa and elsewhere, defendant TAYLOR, knowingly and willfully gave and caused others to give false information as to name, address, and period of residence in the voting district for the purpose of establishing one's eligibility to register and to vote in primary and general elections held in part for the purpose of electing any candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives, that is, TAYLOR submitted or caused to be submitted voter registration forms, absentee ballot request

forms and absentee ballots/affidavits containing false information for the individuals listed below, without their knowledge or consent, and caused these forms and ballots/affidavits to be delivered to the Woodbury County Auditor's Office.

<u>Count</u>	<u>Voter</u>	<u>Voting Document</u>	<u>Date</u>
1	TTD	Absentee Ballot Request	5/20/2020
2	TLD	Voter Registration Form	5/20/2020
3	TLD	Absentee Ballot Request	5/20/2020
4	TTD	Absentee Ballot/Affidavit (P)	6/1/2020
5	TLD	Absentee Ballot/Affidavit (P)	6/1/2020
6	TTD	Absentee Ballot Request	9/18/2020
7	TLD	Absentee Ballot Request	9/19/2020
8	TTD	Absentee Ballot/Affidavit (G)	10/16/2020
9	TLD	Absentee Ballot/Affidavit (G)	10/16/2020
10	NP	Absentee Ballot Request	5/21/2020
11	TP	Absentee Ballot Request	5/21/2020
12	TP	Absentee Ballot/Affidavit (P)	6/1/2020

<u>Count</u>	<u>Voter</u>	<u>Voting Document</u>	<u>Date</u>
13	NP	Absentee Ballot/Affidavit (P)	6/2/2020
14	NP	Absentee Ballot Request	9/18/2020
15	TP	Absentee Ballot Request	9/19/2020
16	YN	Voter Registration Form	4/18/2020
17	YN	Absentee Ballot Request	4/18/2020
18	YN	Absentee Ballot/Affidavit (P)	5/19/2020
19	YN	Absentee Ballot Request	9/18/2020
20	NH	Absentee Ballot Request	5/9/2020
21	NH	Absentee Ballot/Affidavit (P)	6/1/2020
22	AL1	Voter Registration Form	4/7/2020
23	AL1	Absentee Ballot/Affidavit (P)	5/19/2020
24	AL2	Absentee Ballot Request	9/27/2020
25	AL1	Absentee Ballot/Affidavit (G)	10/16/2020
26	AL2	Absentee Ballot/Affidavit (G)	10/16/2020

This was in violation of Title 52, United States Code, Section 10307(c) and Title 18,
United States Code, Section 2.

COUNTS 27-29

Fraudulent Registration, Aiding and Abetting

25. Paragraphs 1 through 22 are incorporated here.

26. On or about the dates listed below, in the Northern District of Iowa and elsewhere, defendant TAYLOR knowingly and willfully deprived, defrauded, and attempted to deprive and defraud the residents of the State of Iowa of a fair and impartially conducted election process, by the procurement and submission of voter registration applications that were known by TAYLOR to be materially false, fictitious, and fraudulent under the laws of the State in which the election was held, that is, TAYLOR submitted or caused to be submitted voter registration forms, which she knew to be materially false, fictitious, and fraudulent under the laws of the State of Iowa, and caused these forms to be delivered to the Woodbury County Auditor's Office.

27	AL1	Voter Registration Form	4/7/2020
28	YN	Voter Registration Form	4/18/2020
29	TLD	Voter Registration Form	5/20/2020

This was in violation of Title 52, United States Code, Section 20511(2)(A), and Title 18, United States Code, Section 2.

COUNTS 30-52

Fraudulent Voting, Aiding and Abetting

27. Paragraphs 1 through 22 are incorporated here.

28. On or about the dates listed below, in the Northern District of Iowa and elsewhere, defendant TAYLOR knowingly and willfully deprived, defrauded, and attempted to deprive and defraud the residents of the State of Iowa of a fair and impartially conducted election process, by the procurement, casting, and tabulation of ballots that were known by TAYLOR to be materially false, fictitious, and fraudulent under the laws of the State in which the election was held, that is, TAYLOR submitted or caused to be submitted absentee ballot request forms and absentee ballots for the individuals listed below, which she knew to be materially false, fictitious, and fraudulent under the laws of the State of Iowa, and caused these ballots to be delivered to the Woodbury County Auditor's Office.

30	TTD	Absentee Ballot Request	5/20/2020
31	TLD	Absentee Ballot Request	5/20/2020
32	TTD	Absentee Ballot/Affidavit (P)	6/1/2020
33	TLD	Absentee Ballot/Affidavit (P)	6/1/2020
34	TTD	Absentee Ballot Request	9/18/2020
35	TLD	Absentee Ballot Request	9/19/2020
36	TTD	Absentee Ballot/Affidavit (G)	10/16/2020
37	TLD	Absentee Ballot/Affidavit (G)	10/16/2020

38	NP	Absentee Ballot Request	5/21/2020
39	TP	Absentee Ballot Request	5/21/2020
40	TP	Absentee Ballot/Affidavit (P)	6/1/2020
41	NP	Absentee Ballot/Affidavit (P)	6/2/2020
42	NP	Absentee Ballot Request	9/18/2020
43	TP	Absentee Ballot Request	9/19/2020
44	YN	Absentee Ballot Request	4/18/2020
45	YN	Absentee Ballot/Affidavit (P)	5/19/2020
46	YN	Absentee Ballot Request	9/18/2020
47	NH	Absentee Ballot Request	5/9/2020
48	NH	Absentee Ballot/Affidavit (P)	6/1/2020
49	AL1	Absentee Ballot/Affidavit (P)	5/19/2020
50	AL2	Absentee Ballot Request	9/27/2020
51	AL1	Absentee Ballot/Affidavit (G)	10/16/2020
52	AL2	Absentee Ballot/Affidavit (G)	10/16/2020

This was in violation of Title 52, United States Code, Section 20511(2)(B), and Title 18, United States Code, Section 2.

A TRUE BILL

/s/

~~Grand Jury Foreperson~~

4/11/23
Date

TIMOTHY T. DUAX
United States Attorney

By:



RON TIMMONS
Assistant United States Attorney

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

By:



RICHARD B. EVANS
Trial Attorney
Public Integrity Section
U.S. Department of Justice

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY

And filed JAN 11 2023
PAUL DE YOUNG, CLERK