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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 25-CR-20560

vs.

HON. SUSAN K. DeCLERCQ

D-1 DAVID TAYLOR,
D-2 MICHELLE BRANNON, and
D-3 KATHLEEN KLEIN,

Defendants.

VIOLATIONS:

Conspiracy to Commit Forced Labor
(18 U.S.C. § 1594(b))

Forced Labor
(18 U.S.C. § 1589)

Money Laundering Conspiracy
(18 U.S.C. § 1956(h))

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

F I L E D
JUL 29 2026

CLERK'S OFFICE
DETROIT

At times relevant to this Indictment:

1. Kingdom of God Global Church (KOGGC), formerly known as Joshua Media Ministries International (JMMI), was an organization led by DAVID E. TAYLOR.

2. MICHELLE BRANNON was the Executive Director of KOGGC.

3. KATHLEEN KLEIN was an Executive of KOGGC and known within

KOGGC as “Prophetess.”

4. BRANNON and KLEIN assisted TAYLOR in managing KOGGC and carrying out TAYLOR’s orders.

5. TAYLOR called himself Apostle and Jesus’s best friend. He claimed he had multiple face-to-face encounters with God and that God had given him the keys to the Kingdom on Earth.

6. TAYLOR established a call center at 20320 Superior Road in Taylor, Michigan, to raise money from donors. TAYLOR subsequently opened and operated call centers in other locations in the United States including in Missouri, Florida, and Texas.

7. TAYLOR recruited individuals from across the country to work as laborers at the call centers. TAYLOR, BRANNON, and KLEIN instructed the call center laborers to make a specific number of calls and raise a specific amount of money each day.

8. The call center laborers were commonly unpaid.

9. KOGGC received approximately \$50 million in donations since 2014. Laborers often told donors that their donations would be used to build water wells in Africa, for disaster relief in the United States, to support victims of human trafficking, and to support the ministry of KOGGC. TAYLOR used some of these donations to purchase multiple mansions, luxury vehicles, luxury goods, and other

items.

10. TAYLOR also recruited individuals to work as his “armor bearers.” Armor bearers served as TAYLOR’s personal servants. The armor bearers carried out TAYLOR’s demands, including providing food for him, transporting him, maintaining his houses and cars, bringing women from ministry houses, airports, and other locations to his location, and ensuring that those women took Plan B emergency contraceptives.

11. Armor bearers, like call center laborers, were commonly unpaid.

COUNT ONE

(Conspiracy to Commit Forced Labor - 18 U.S.C. §§ 1594(b) and 1589)

D-1 DAVID TAYLOR

D-2 MICHELLE BRANNON

D-3 KATHLEEN KLEIN

12. The general allegations are included in this count.

THE CONSPIRACY

13. From on or about April 2013 and continuing through at least July 2025, in the Eastern District of Michigan and elsewhere, the defendants, DAVID TAYLOR, MICHELLE BRANNON, and KATHLEEN KLEIN, and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to provide and obtain the labor and services of one and more persons by any one of, and by any combination of, the following means — (1) force, threats of force,

physical restraint, and threats of physical restraint to that person and another person; (2) serious harm and threats of serious harm to that person and another person; (3) abuse and threatened abuse of law and legal process; and (4) any scheme, plan, and pattern intended to cause the person to believe that, if the person did not perform such labor and services, that person and another person would suffer serious harm and physical restraint, in violation of 18 U.S.C. § 1589.

THE OBJECT OF THE CONSPIRACY

14. The object of the conspiracy was for the defendants, and others known and unknown to the Grand Jury, to obtain the labor and services of at least one person in the Eastern District of Michigan and elsewhere.

THE MANNER AND MEANS OF THE CONSPIRACY

15. The manner and means used by the conspiracy to further its goals and to achieve its objects include, but are not limited to, the following:

16. TAYLOR recruited individuals from across the country to work for KOGGC as laborers at the call centers and as armor bearers.

17. Once a laborer began at KOGGC, TAYLOR, BRANNON, KLEIN, and other members of the conspiracy often required the laborer, including Victims 1-8, to work long hours without pay and punished those who failed or refused.

18. TAYLOR also directed dozens of female laborers to perform sex acts and take sexually explicit pictures and videos. TAYLOR required the female

laborers to provide him the explicit images and videos, often threatening them with expulsion and harmful spiritual and reputational consequences if they disobeyed or delayed complying with his orders. At times, BRANNON worked with TAYLOR to pressure the female laborers into complying with TAYLOR'S demands.

19. TAYLOR saved the videos and photographs on his personal electronic devices for his benefit and, at times, shared them and distributed them electronically with other members of KOGGC, including BRANNON.

20. To compel obedience to TAYLOR's commands, TAYLOR, BRANNON, KLEIN, and other members of the conspiracy controlled practically every aspect of the daily living of certain laborers and created rules. For example:

- a. TAYLOR, BRANNON, and KLEIN commonly demanded that laborers cut off any family or friends who questioned TAYLOR or KOGGC.
- b. TAYLOR and BRANNON usually forced full-time laborers to give up any outside employment.
- c. Laborers often slept in the call center facility or in a "ministry" house.
- d. TAYLOR prohibited dating within KOGGC.
- e. TAYLOR and BRANNON demanded that laborers apply for a government funded Electronic Benefits Transfer (EBT) card, claiming to be homeless and giving a false address. Laborers who obtained an EBT card had to give the card to TAYLOR, BRANNON, or to other KOGGC

staff members who reported to TAYLOR and BRANNON. TAYLOR and BRANNON used the EBT government funds to purchase food for KOGGC staff. The government money obtained and spent by TAYLOR and BRANNON included funds from the Supplemental Nutrition Assistance Program (SNAP) (formerly known as the Food Stamp Program), which is a federal program that provides nutrition benefits to low-income individuals and families to help them purchase food.

21. TAYLOR required laborers to follow the rules and orders he created and communicated. If a laborer disobeyed an order or failed to follow a rule, TAYLOR, BRANNON, KLEIN, and other members of the conspiracy would commonly punish the laborer and claim the laborer was defying God and would suffer in hell. Punishments included physical assault, additional work, sleep deprivation, food restrictions, loss of shelter, psychological abuse, and threats of spiritual damnation.

22. TAYLOR, BRANNON, KLEIN, and other members of the conspiracy created a climate of fear that deterred laborers from leaving KOGGC by telling laborers that, if they left KOGGC, they would suffer consequences including sickness, accidents, death, and eternal damnation. TAYLOR, BRANNON, KLEIN, and other members of the conspiracy caused laborers to fear that not obeying their orders would result in being cast out from KOGGC, leaving

them homeless and separated from God. At times, TAYLOR and BRANNON agreed to disseminate sexually explicit images TAYLOR received as another form of punishment and retaliation for speaking out about KOGGC.

23. TAYLOR, BRANNON, KLEIN, and other members of the conspiracy regularly conducted meetings with large groups of members to “rebuke” and publicly humiliate the laborers who “disobeyed.” “Rebuking” included yelling, humiliation, sometimes requiring the subjects of the rebuking to get on their knees in an attitude of repentance, occasional physical assaults, and threats of further physical violence. “Rebukings” lasted from several minutes to several hours.

24. TAYLOR, and other members of the conspiracy, required laborers to attend lengthy meetings that resulted in laborers—who already were required to work long hours in the call center and on other tasks required by TAYLOR, BRANNON, and KLEIN—not being able to sleep at night.

25. During the meetings, which often lasted hours, TAYLOR regularly demanded that laborers raise more money, admonished laborers for not meeting his monetary goals, explained the power God gave him, rebuked laborers for disobedience, and cursed those who stopped working for him or spoke negatively about him.

26. If laborers did not meet their quota, TAYLOR, BRANNON, KLEIN,

and other members of the conspiracy often forbade them from sleeping, causing many laborers to operate in a state of sleep deprivation.

27. TAYLOR, BRANNON, KLEIN, and other members of the conspiracy required laborers to request permission to leave their housing or the call centers, controlled their access to medical care, and controlled their access to transportation.

28. TAYLOR required some laborers to work in a designated group within KOGGC, such as a Facebook team, a finance team, a call center team, and a music team, in addition to working in the call centers to assist in bringing in monetary donations.

29. Generally, the call centers were organized into three phases: “Scouting”; “Prepping”; and “Connecting & Closing.” “Scouts” were responsible for contacting a certain number of people on the phone and talking with them for a couple minutes before “passing” the call to the next phase, the “Prepper.” When the “Prepper” began speaking with a caller, it was the “Prepper’s” responsibility to continue talking with the caller and further build rapport with the caller with a view towards eventually asking the caller for a donation. Finally, in the “Connecting” phase, a “Closer” would talk with the caller and ask for a donation. Throughout the three phases, laborers took notes about the caller’s needs and concerns, as well as financial resources, to maximize donations.

30. To encourage donations, at times TAYLOR and BRANNON instructed the laborers to falsely state that the donated funds would be spent on charitable works, such as providing water wells for impoverished communities overseas or supporting victims of human trafficking.

31. TAYLOR consistently set unobtainable daily, weekly, monthly, and yearly monetary fundraising goals for the laborers. TAYLOR, BRANNON, KLEIN, and other members of the conspiracy regularly punished laborers who did not meet the required monetary donation quota for the day.

32. TAYLOR, BRANNON, and KLEIN frequently communicated orders and punishments via text messages. For example:

- a. On or about October 6, 2020, at 5:31am, BRANNON sent a text message to several members of the “media team,” including V-3, stating, “Media team no going to sleep until the Mosaic video is done!”
- b. On or about May 5, 2021, at 12:26am, TAYLOR texted to DG, his armor bearer at the time who was tasked with communicating his orders to KOGGC staff, whose identity is known to the Grand Jury, “. . . you’ll have to raise \$164k today !! Each hour you fall behind consequences will start . . we will mess with the food . You will fast from the regular food or abstain for a while normally . . . As of now there’s a 21 day peanut butter and jelly regiment like before ! . . . [those] who do not push in their

calls individually and as a team with the right amount of people and closing numbers at 6pm they don't eat dinner at all.. if they do good afterward this time then at the end of the night they may get a snack before bed but not much and this regiment will go on every day for 21 days until they obey . . Take away the food !! There will be other consequences!! We must make them fast and pray !!”

- c. On or about September 11, 2021, at 3:55am, TAYLOR texted to DG, “Those in the top 9 that don't do well will stay up and close and stay on top of the delinquents . . . Put the pressure of them not having their time off . . nor food . . they will fast !! . . .”
- d. On or about September 19, 2021, at 9:10pm, TAYLOR texted to DG, “Michelle and top 9 closers . . How is it in 5 hours you'll have only raised \$6k . . THIS IS A MARATHON!! You'll are not taking this serious enough !! THIS HAS TO STOP !! Nobody gets lunch or dinner !! You'll are going to press for another 5 hours !! Make sure no one eats until these numbers change . If they don't change in the next 5 hours you'll are going to work until 4am !! . . . Now Stand up and tell everyone they are not eating (have they eaten I hope not??) Also that over the next 5 hours if they don't make up for this they are not going to bed tonight until 4am . . ”

- e. On or about September 19, 2021, at 10:21pm, TAYLOR texted to DG,
“Michelle and [KOGGC leader] Make them all stand and Tell them if the punishment of 4am don’t work I’m going to make it worser and worser . . They are going to get their beds out of my house and sleep in the garage !! Everyone piled in there !! This ruthless bootcamp is going to get worse and worse . . until they do what we are telling them . . their will only be soup , bread and water for all the degenerates every day . . nothing else.”
- f. On or about September 21, 2021, at 3:52am, TAYLOR texted to DG,
“Let everyone know we have to raise at least \$50k by 12 midnight if this happens the top 9 and those who did well can rest but the others who didn’t . . . will stay up until 4am and study notes and They will wake up at 8am-9am . . . if they don’t do good the first 5 hours 9 – 2pm they will not get lunch and for dinner they will only have soup and salad and water.”
- g. On or about September 28, 2021, at 7:57am, TAYLOR texted to DG,
“POUR WATER ON EVERYONES FACES THAT’S HALF WAY SLEEPING AND NOT WORKING WAKE THEM UP NOW !! . . . My next level of judgment tomorrow is that it won’t be to just 4am it will be every hour you waste in the day will be added on past 4am !! TELL THEM ALL TO STAND NOW AND YOU THROW WATER ON

THEIR FACES ! Especially the people not doing anything or helping bring in the money !! You tell them I don't care about them being sick !! ..”

- h. On or about October 27, 2021, at 3:23am, TAYLOR texted to DG, “. . . I can't be kind to you letting you start later and sleep in . . . I can't be kind with none of you ! If this doesn't change in the next 2 hours !! You'll are working until 4am and then getting up at 8am in the morning to start again !! None of you including top closers will not be able to get away with not working and raising the money we need or meeting our goal when we are in a dire push !! NOW I DONT CARE IF YOU ARE TIRED !! You've crossed the line !! You are going to work all night and get up in the morning !! I want all the names of those who are not helping with this push or doing their work or not showing change . . NOW . . They are going to the homeless shelter !! . . . ”
- i. On or about June 21, 2024, at 11:01pm, KLEIN texted to a group titled “Houston Managers” that two laborers “will be on heavy labor outside tomorrow and Sunday!! They want to sit and hide when they're supposed to be working . . . , they will see how doing some work really feels!! Make sure it's not some pansy work!!”

- j. On or about July 24, 2024, at 7:10am, KLEIN texted to the “Houston Managers” group, “. . . we need the people taken to the street.”
- k. On or about February 28, 2024, at 5:04pm, KLEIN texted a message from TAYLOR to a group chat with approximately forty laborers titled “Houston Team,” “If they don’t hustle and bring in this \$310k these next 2 days then we have to use all day Friday and Saturday to make up for it !! All they have to do is raise \$155k today and \$155k tomorrow!! Now Choose!!!”
- l. On or about April 12, 2024, at 5:17pm, KLEIN texted to a group chat with approximately twenty-one laborers and BRANNON titled “Food Approvals,” stating, “Low number closers won’t need dinner, they can have PB&J. And to my knowledge, if closes are not up people will be going to the street so this menu might change significantly.”
- m. On or about August 14, 2024, at 11:36pm, KLEIN sent a text message to another group chat with approximately eighteen laborers titled “Floor Managers/Leaders” regarding the consequences for a laborer in poor health, “[laborer] has not been going to the street because of health issues. She can be out in the stairwell and have other consequences as well.”

- n. On or about July 19, 2025, at 9:42am, BRANNON texted to the “Floor Managers/Leaders” group that she was upset more laborers were not suffering consequences for poor performance, “There is so many people who were slacking and were not made to go outside I don’t get it WHY THE FREAK NOT.”
- o. On or about July 19, 2025, at 9:45am, KLEIN emphasized the message BRANNON sent and described in paragraph n.
- p. On or about July 19, 2025, at 9:46am, KLEIN texted to the same group, “It’s frustrating!!”
- q. On or about July 19, 2025, at 9:55am, KLEIN texted to the same group, “[laborer] needs to be out there[.] [laborer] and [laborer] too [.] They need some serious consequences for their rebellious and stubborn behavior that’s ridiculous.”
- r. On or about July 19, 2025, at 10:05am, BRANNON texted to the same group, “I went and physically put them outside”
- s. On or about July 19, 2025, at 10:07am, KLEIN texted to the same group, “That is so disgusting!! I want to Slap them so hard with a drop kick”

33. Similarly, TAYLOR and BRANNON used a group text chat called “Military Bootcamp 5 Taylor” to communicate with laborers, including V-2. In the group chat, TAYLOR and BRANNON sent the following messages among others:

- a. On or about March 10, 2022, at 11:12pm, TAYLOR texted to the group including V-2, "You'll are not going to bed tonight until you raise this \$33K let's go!!"
- b. On or about March 15, 2022, at 1:44am, TAYLOR texted to the group including V-2, "POINT BLANK . . . If you don't work you can't eat."
- c. On or about April 24, 2022, at 9:04pm, TAYLOR texted to the group including V-2, "Repent now niggas All of you get on your knees now and repent !! NOW !! You have pushed God and I too far !! . . . IM DONE !! EVERYONE GO INTO THE TAMPA GARAGE TONIGHT !
! THIS WILL NEVER STOP UNTIL YOU CHANGE
COMPLETETLY."
- d. On or about May 12, 2022, at 6:39pm, TAYLOR texted to the group including V-2, "WARNING TO THE WHOLE STAFF - . . . it's too expensive for us to provide for the amount of people who won't learn to close !! So I'm only buying enough for the few at this point who have applied the training and have learned to close !! . . . If you don't work [effectively] and learn closing like we told you then you won't eat !"
- e. On or about May 26, 2022, at 11:35am, TAYLOR texted to the group including V-2, "WARNING – FROM APOSTLE Michelle deal out consequences to all the closers . . . that are not bringing in their amount . .

Garage in tampa and take away food now !! I want those in Ocala who supposed to be doing their work but are not punished and out in the garage and their food taken away . . . ”

- f. On or about May 27, 2022, at 7:20am, TAYLOR texted to the group including V-2, “JUDGEMENT – These numbers are bad !! . . 7 of the top closers need to go in the garage in tampa now !! . . Also I want food taken away . . Michele deal out consequences to all the closers . . that are not bringing in their amount . . Garage in tampa and take away food now !!”
- g. On or about July 31, 2022, at 12:01am, TAYLOR texted to the group including V-2, “You are getting up at 8 am also !! I want cold water thrown on those who drag and won’t get up ! A big bucket of water . . . MICHELLE . . ENFORCE THIS !!”
- h. On or about October 19, 2022, at 11:46pm, BRANNON texted to the group including V-2, “FROM APOSTLE WARNING . . . TENT AND GARAGE JUDGMENT STARTING TONIGHT FOR 7 DAYS IF AFTER 7 – 14 Days There is no change it’s the public shelter for 1 solid month.”
- i. On or about October 20, 2022, at 4:57pm, BRANNON texted to the group including V-2, “WARNING FROM APOSTLE . . . TOP 6 YOUR

LOW NUMBERS EACH DAY . . . IT HAS TO STOP NOW . . You will be punished constantly until you obey and train your heart and mind to obey the training . . .”

34. TAYLOR also communicated his instructions and commands in messages to laborers often called “Today’s Memo.” For example:

- a. May 20, 2022: “ALL DAY MARATHON TO CATCH UP Every top 10 closers needs to bring in today \$38.6k each All 8 of you top closers along with the ones on your team have only one more day that's Friday before I'm going to send all the top 8 staff back to Ocala in the garage along with everyone under you !! You will either change permanently or die there !! THIS IS GOD AND MY JUDGEMENT COMING !! These are the list of top closers and their teams that are going back to Ocala strait into the garage Saturday if there is no consistent repentance from the whole teams [list of laborers and teams, with “WARNING” noted next to some names] THESE THREE WITH WARNING DIDN’T DO THEIR JOB TODAY AND ARE IN DANGER OF BEING NOT ONLY SENT BACK TO OCALA BUT GRAVER CONSEQUENCES NOTE: When you are sent back the pressure and consequences are going to be 10 times greater OTHER OPTION – EACH OF YOU TOP 10 MUST DO GOOD ON FRIDAY

TO RAISE \$38.6k . . . THEN IF NOT MUST TURN SATURDAY
INTO A MARATHON DAY OR MOVE OUT OF TAMPA PLACE TO
OCALA !!”

b. May 26, 2022: “MEMO -You'll should be in marathon all day !! We have
to raise \$92k a day starting today for 6 days !! Michele make them push
!! WARNING-- FROM APOSTLE Michele deal out consequences to
all the closers starting with those among the top 9 and bottom below now
that are not bringing in their amount .. Garage in tampa and take away
food now !! I want those in Ocala who supposed to be doing their work
but are not punished and out in the garage and their food taken away to
enforce all of them applying their training .. Everyone especially those
who are part of the closing circle that suppose to be bringing in finances
!! I WANT THIS DONE NOW MICHELE BECAUSE THESE TOP 9
ARE NOT ADMINISTERING ANYTHING THAT IS CREATING
FORCED CHANGE”

c. May 27, 2022: “WARNING If this \$548k is not caught up in 6 days
I'm sending them back to the bootcamp in Ocala!! All of them have to go
back!! JUDGMENT . . . Michele deal out consequences to all the
closers starting with those among the top 9 and bottom below now that
are not bringing in their amount .. Garage in tampa and take away food

now !! I want those in Ocala who supposed to be doing their work but are not punished and put in the garage and their food taken away to enforce all of them applying their training”

- d. July 31, 2022: “WARNING [] Everyone .. I mean every single person must now be raked over the coals from Michelle down to the top 9 down to the bottom 20 and get your butts back in order !! You’ll have gotten this ministry in a shambles ... a complete mess !! I want consequences now put on the top bottom 20 under the 9 who can close and help but who is not and their numbers are low !! NOW !! I want cold water thrown on anyone who don't get up on time and who is dragging!! From the top 9 down. . . . I want their numbers looked at and scrutinized then consequences put on each of them !! I want cold water thrown in the morning on anyone who don't get up on time and who is dragging!! From the top 9 down”

35. TAYLOR and BRANNON also used text messages to pressure female laborers to comply with Taylor’s demands for sexually explicit images. TAYLOR, coordinating with BRANNON, threatened some of these female laborers with harmful spiritual and reputational consequences if they disobeyed or delayed complying with his orders to produce and send him graphic sexual images and videos.

36. In 2020, TAYLOR and BRANNON demanded F-1 engage in sexual acts, produce explicit images and videos, and send them to TAYLOR. F-1 was a female laborer for KOGGC who was 19 years old at the time. The following are excerpts from the relevant texts:

- a. On or about March 28, 2020, TAYLOR texted F-1, “God The Father has ordained us to be together . . . Anything you resist that God ordains for your life will be met by Satan coming next . . .”
- b. On or about March 28, 2020, TAYLOR texted F-1 he “also saw your future if you disobeyed and where you and your whole life ended up [F-1] even your soul and I don't want that for you and neither does the Lord.”
- c. On or about March 29, 2020, TAYLOR texted F-1, “do you understand what's at stake with you not taking serious enough Gods will for us to be together !! Do you understand how Satan is trying to deceive you and make this about how you feel or how you don't feel in comparison to Gods will.. ?? And most of all do you understand what's going to take place in your life if you don't stop fighting this in your heart and submit !!”
- d. On or about two minutes later on March 29, 2020, TAYLOR texted F-1, “Satan.. He's going to destroy you if you don't surrender honey.”

- e. On or about March 29, 2020, TAYLOR texted F-1, “[f]irst of all [God] should be able to ask you to do anything and you should have the heart to surrender and do that no questions asked !! But what's dangerous is He is so kind .. He will not force anyone to do His will or love it but in the end because they didn't serve the Lord with gladness of heart and was not willing He throws them into hell!! . . . If Mary would have rejected giving her body to God for Jesus when she was approached by the angel Gabriel she wouldn't be even in heaven today !! I'm greater in rank with God than an angel and I was sent to tell you what Gods will is .. When I was approached about you from him I didn't love you either in this way.. I thought to myself how can I fall in love with a young little girl ... No !! I just couldn't see you as a woman... But He explained to me that I didn't have to love you initially I just needed to ‘love Him’ and to obey His will for us to be married ..”
- f. When F-1 did not respond, on or about March 30, 2020, TAYLOR texted F-1, “[n]o one treats my texts to them like this but you !! If you don’t stop this demonic behavior I’m throwing your butt out of here with the quickness !! You better repent for this !! NOW!!”
- g. On or about ten minutes later on March 30, 2020, TAYLOR texted BRANNON to arrange for KLEIN to direct F-1 to respond to

TAYLOR's texts. TAYLOR told BRANNON, "[w]e need to set this order now."

- h. On or about March 30, 2020, TAYLOR told F-1, "Your response is crap!! I sending Michelle with a message to you !! You better listen !! YOU ARE DISHONORING ME BY NOT RESPONDING AT ALL ON THE HIGHEST LEVEL !! It's more than this."
- i. About two minutes later on March 30, 2020, TAYLOR told F-1, "This is the end road for you the Lord told me that you not even responding to me romantically is your heart being evil and ignoring !! There's no more patience for your lack of honor in this area !!"
- j. By March 30, 2020, BRANNON had communicated with F-1. TAYLOR told BRANNON, "[s]he needs to repent" and "[d]on't let her get off the hook with this." TAYLOR asked, "[d]id you tell her I'm going to put her out !! If this continues!!" BRANNON replied that she had and that "[s]he will be put out if she don't repent and if she does this again."
- k. During the next 24 hours, TAYLOR sent numerous texts to F-1 about God, repentance, and hell. He told her that "GOD AND I ARE DONE WITH YOU IF YOU DONT REPENT SINCERELY!!"
- l. On or about March 31, 2020, TAYLOR told F-1, "This is your last chance or I'm putting you out of here !!"

- m. Later on or about March 31, 2020, F-1 sent TAYLOR non-intimate pictures of herself.
- n. Two minutes after receiving the non-intimate pictures from F-1 on March 31, 2020, TAYLOR instructed BRANNON to tell F-1, "she should have already been as a woman sending me sexy pictures even her body." BRANNON responded, "Yes Sir!"
- o. On or about April 1, 2020, TAYLOR directed BRANNON to "talk to [F-1] about sending me sexy pictures being a woman .. naked with heels etc."
- p. On or about April 2, 2020, following a series of texts, F-1 texted TAYLOR and explained, "I absolutely fear getting kicked out and sent to hell and that's why I'm going after getting the right heart I think because of that is where sometimes I get into doing it because I feel I have to and not wanting to do it."
- q. On or about April 3, 2020, TAYLOR texted F-1, "[l]ast night was serious, the Lord visited me [F-1] and told me because you've started to truly repent to open my heart to you again and that He was too...He continued and said to me furthermore not to give up on the future He has for us and to protect you and help save and preserve you from Satan the enemy who's trying to deceive you in this season because of your lack of

understanding things [...] P.S. Honey Take some pictures of your body for me.. I want to see your gap babe.. I want to see your gap from the front..I want to see your butt and your gap as you bend over and take a pic from the back .. i want to see my wife's body .. I want to see pics of your body in high heels while your naked babe .. I just think you're soo hot .. I love you and thank you for listening to my heart .. I adore you!!”

- r. On or about April 3, 2020, F-1 responded to TAYLOR, “[t]hank you for sharing your heart to me and thank you for all that you have said about me too I love you I am still going after a changed a heart and not going to stop I will take some pictures like youre asking about.”
- s. On or about April 5, 2020, TAYLOR texted F-1, “[a]lso I've been waiting on you to send me pictures my love why is it taking you soo long to do this ??”
- t. On or about April 5, 2020, TAYLOR asked BRANNON if she had talked to F-1. BRANNON responded, “I talked to [F-1] yesterday and told her she needs to be making sure to send you texts and pictures and not when you ask and that she needs to pursue you.”
- u. On or about April 7, 2020, F-1 sent TAYLOR a picture of her buttocks in a thong.
- v. On or about May 4, 2020, TAYLOR texted F-1, “I want you to show me

your body now.. Without panties on .. I want to see my pussy and your gap and your butt!! I told you I'm being more sexual with you now more than ever !! I want you to do it now !!”

w. On or about May 4, 2020, TAYLOR then sent a series of texts to F-1:

- “At this point You either completely belong to me and are going to submit or you're not ...”
- “You either are going to be my wife my girl or you're not”
- “And I'm not putting up With anything else outside of that”
“You belong to me .. Your body belongs to me”
- “I'm going to drive this thing out of you or its going to take you out with it”

x. On or about May 4, 2020, F-1 replied, “yes sir I understand” and sent TAYLOR a photo exposing her pubic area and buttocks. TAYLOR responded, “open your legs” and then “show me my pussy.” F-1 asked, “Like while I am sitting down?” TAYLOR proceeded to explain in detail what he wanted to see. F-1 then sent nude images of herself in positions TAYLOR instructed her to be in.

y. On or about May 4, 2020, TAYLOR again directed F-1 how to pose for pictures. TAYLOR then told F-1 to “Make a declaration of love to me and tell me you love me.. that you want me.. that you want me to be the

first and only man in your pussy . That you're my wife and I'm your husband ..That you want to have my babies . That you want to give me children .. Tell me you will suck your husbands dick until he cums and orgasms .. Tell me you want to put your mouth on dick and please me !! Record it on voice audio and send it to me.”

- z. On or about May 4, 2020, F-1 sent a picture to TAYLOR, who replied that she looked sick, “but part of your sickness the Lord told me is judgement from him because of your dishonor to me.. You cannot dishonor me not only as your apostle but as your man or as a man .. God will let sickness and death and other things hot your life all because you refuse in your heart to be happy with me and because you reject all of this ..!!”
- aa. On or about May 4, 2020, 2020, TAYLOR told F-1 he was “sending [BRANNON] to work with you for a whole month .,maybe this will help you too ok..”
- bb. On May 4, 2020, TAYLOR told F-1, “God sent me to your life... And He sent me to love you in a romantic way also!! And you me!!! Why is this so hard to accept for you ? What is inside of you that hates this for you and me??” F-1 replied, “Honestly I want to be your daughter I know that sounds ridiculous especially after everything but it is the truth.”

cc. Minutes later on or about May 4, 2020, TAYLOR told F-1 she was

disobedient and texted, “You won’t see me or your mom when you’re in

hell forever when we are in Heaven !! You will then loose everything!!

There will be no more peaceful thoughts or etc !!” and “Nor will you see

your grandma or sisters .. Is this what you really want !! Is being this

stubborn really worth it [F-1]???” And then, “This is incredible!! But

that’s what He said in hell about you that you refused to do his will..You

only have a short time to obey Him [F-1].. make it count.”

37. In a series of texts, TAYLOR and BRANNON directed F-2 to produce explicit images and send them to TAYLOR. F-2 was a female laborer for KOGGC who was 18 years old at the time. The following are excerpts from the relevant texts:

- a. On or about August 5, 2022, TAYLOR told BRANNON, “I need you to talk to [F-2] like you did [F-1] .. and give her wisdom about this . Let her talk to you ok ..” BRANNON responded, “Ok yes Sir!” and “Anything for you Sir!”
- b. On or about August 6, 2022, BRANNON and TAYLOR agreed to relocate F-2 from Ocala, Florida, where she lived with her mother, who was also a member of KOGGC, to Tampa, Florida, where BRANNON lived, “so [BRANNON] can control who is around and she wouldn’t be

around her mom.”

- c. On or about August 9, 2022, TAYLOR texted BRANNON, “when you talk to [F-2] make sure you build honor around this and how this is a great honor how and submitted she needs to be and change her heart and anything in her mindset that’s fighting her from yielding or surrendering to me.”
- d. On or about August 9, 2022, TAYLOR texted BRANNON that F-2 “needs to grow up in her as womanhood ., That when I talk to her about natural things as a man . Let her know how man[y] 18 year olds 19 year olds and 20 year olds women want to be with me !!”
- e. On or about August 9, 2022, TAYLOR then told BRANNON to tell F-2 “to repent for not yielding and being open enough in her heart to this in Gods timing.”
- f. On or about August 10, 2022, BRANNON responded that she had talked to F-2 and “did build honor for sure and j did tell her she has to submit to you. I also told her how you have had beautiful women around the world that would love to be with her. I also told her she needs to mature when you want to talk to her about mature things. She said she was getting more comfortable with those things. I am going to talk to her more.”
- g. On or about August 12, 2022, TAYLOR texted BRANNON “[t]his is

what [F-2] wrote me after I asked her how and why isn't her heart right or in the right place after she told me her heart wasn't right ... She needs to be warned if it's not and don't get there what will happen but it's her choice"; "I'm not trying to force her to do anything .."

- h. On or about August 12, 2022, TAYLOR then forwarded to BRANNON a message he had received from F-2 that said: "Yes Sir. The relationship love you have for me isn't the same for me. I don't want to falsify any responses, especially sexually. It is taking me long to see you as my husband. I know I must be patience, I don't want to force anything on myself which I feel like I would be doing if I started to intimately converse back how you do with me ... I'm not attracted or in love, therefore I feel like I can't give you want you want from me right now, which is to be yours completely. I am a starter, I feel like a starter to all this. I have already felt like I'm moving in a fast pace, I know this is all on God's timing. I want to be able to give you my 100. I have thought, do I have to live up to a standard of a King now, will I have to do or say things a certain way? I do love you Sir and I want to have Honor for you in every way. I want to be honest as you have told me to be."
- i. On or about August 12, 2022, BRANNON and TAYLOR exchanged a series of texts about F-2's maturity. TAYLOR told BRANNON to tell F-

2 “that her mom hasn’t taught her to be a woman.” BRANNON

responded that “the main reason [F-2] wants to be here is the separation with her mom so she can develop more as a women. She said she has talked to you and me more then she has ever talked to her mom.”

- j. On or about August 16, 2022, TAYLOR forwarded to BRANNON a message in which TAYLOR told F-2, “...This is why God brought you to Tampa to expose these things in you so you can be the women you supposed to !! You’ve been doing good so far but God is going deeper by this dream !! You need to first understand if you ever betray me or turn for any reason even if you think I’m wrong about something God is already warning that He’s going to throw you into hell.”
- k. On or about August 16, 2022, TAYLOR then forwarded to BRANNON the list of things he sent F-2 for F-2 to do to avoid “turning.” TAYLOR ended the list by explaining “[o]ne of the reasons [F-2] I’ve been very bold and usually aggressive in getting you to open up to me sexually is because you have to create a strong bond with me now as your husband . There can be no delay because the enemy wants to turn you .”
- l. On or about four minutes later on August 16, 2022, BRANNON responded “[y]es Sir I understand and will talk to her Sir!”
- m. Although TAYLOR and BRANNON often controlled laborers’ access to

cellphones, on or about August 16, 2022, BRANNON told TAYLOR she had provided F-2 with a phone. TAYLOR told BRANNON, “tell her She must guard that phone with her life and keep that phone protected and on locked .. Don’t be careless and leave it unlocked or have any settings that show on the screen her messages.”

- n. On or about August 17, 2022, TAYLOR began texting with F-2 on a new chat thread.
- o. On or about August 27, 2022, TAYLOR asked F-2, “When are you going to take pictures like I asked and let me see your gorgeous body ! You are taking soo long why honey ?”
- p. On or about October 23, 2022, F-2 told TAYLOR she did not reciprocate romantic feelings. TAYLOR told her, “God has given you to me as my wife and I love you soo much” and then, “[y]ou need to drop what you’re doing and answer my texts !!”
- q. On or about October 23, 2022, TAYLOR told F-2, “But I’m not the type that’s going to beg for your love or push or force !! All that’s soo cheap to me .. It has to be real and genuine on your own ... **It’s your choice ..**
God gives us a choice to do his will or not do it !! I just choose to do it !!” F-2 replied, “I understand, I want it to be my own and genuine. Not doing his will is gonna take me to hell, I don’t want to go to hell...If I

made a choice to forget this, I'm going to hell. That's the fear I have."

- r. On or about October 23, 2022, F-2 then asked, "Wouldn't I go to hell if I didn't want you?" TAYLOR responded, "Wanting me is a part of Gods will for your life. So yes you would .. But God is not going to force you .. I mean if you want me to let you go I can !! I don't want you to do this just because you don't want to go to hell!! I didn't know that this was the only motivator for you doing this !! If so this situation ..it's worse than I imagined with you .. Some people are in hell just because they wanted to go to heaven to escape hell and God didn't let them in because their heart was wrong! They still didn't chose him they chose heaven .. it wasn't about loving God !!(I do Gods will because I love him not because the threat of hell forces me to !! Hell has just be a place I understand I will go and be separated from the one I now Love - The Lord .."
- s. On or about October 23, 2022, TAYLOR then texted F-2, "I want you to be happy and free and God do too ..to choose on your own even if it means hell for you in the end of your life.. There's no force here .." A few minutes later, TAYLOR texted, "(I had a vision the other day about you being in hell and didn't understand it because all was shown was a quick glimpse of you moving uncontrollably in the fire .. I asked God what does that mean why did I see her there ! ?? But He said nothing .

After having this conversation with you Now I see what He's saying !!”

- t. On or about November 7, 2022, TAYLOR texted F-2, “[y]ou belong to me” and then “[d]o you surrender ...??”
- u. On or about November 17, 2022, TAYLOR confronted F-2 about pictures she previously sent him. TAYLOR texted, “Are you lying to me .. ? You know to lie to me is very dangerous and can cost you your life right ??” TAYLOR then texted F-2, “[a]ny woman that lies to you don’t respect or honor you !! There has already been 5 people who has actually died from lying to me and it was instant on the spot !!” And a few minutes later, “[i]f you don’t stop lying to me I’m going to put you out today !!”
- v. On or about November 25, 2022, TAYLOR continued to confront F-2, when he asked, “how did you think you could do something like this against me and not think God would expose you and destroy you for dishonoring me ??”
- w. On or about December 28, 2022, TAYLOR told F-2, “I love you I’ve done all I’ve can to try and help you !! Like even for me to have to ask you to give me your pussy I shouldn’t have to !! It’s something you know that belongs to me and you should want to surrender that on your own at anytime frequently without me asking !! It just still seems like you are

not getting the point or truly changing ..”

- x. On or about January 16, 2023, F-2 thanked TAYLOR for having BRANNON and another KOGGC member “correct me. I know I’ve been a complete traitor at heart, I need to change. I love you.” TAYLOR asked if they explained that she had been “a complete traitor at heart?” F-2 responded, “Yes, they corrected me on how I don’t have honor for you, how my focus is somewhere else, distracted. If I keep it up I will be destroyed, out of the Kingdom.”
- y. On or about January 18, 2023, TAYLOR texted F-2, “I’ve even had [BRANNON] and others talk to you multiple times and God even come in dreams to warn you about your evil character and you still choose the evil path .”
- z. On or about January 18, 2023, TAYLOR texted F-2, “Because of Jesus being directly with me !! You must take your eternal life serious but as I’ve said you don’t have to do this you have a choice .. I’ve had multiple people try and help you and think ?? You are still doing dumb crap !! It’s been almost a year and you are still in the same situation !! That’s not someone who is being obedient that’s someone that think they got time to play around and do things on their own time when they get ready !! That character behavior right there alone is going to lead you to hell ...”

aa. On or about January 18, 2023, F-2 texted, "I don't want to be removed."

bb. On or about March 11, 2023, TAYLOR told F-2 that her father's continued incarceration was due to F-2's disobedience. "The delay to your prayers concerning your dad was all held up because you disobeyed and dishonored me !! You must always understand the vast amount of heaven power I carry and that you are around just being with me !! Even when you lie judgements starts even if you can't see it or where the judgement is being administered!! You must understand this dynamic if you're not going to be blessed with me or destroyed !! This is very serious !! Your disobedience held your dads blessing up for months !! I know at least about 8 months !!"

cc. In a series of texts throughout October 2024, TAYLOR berated F-2 for "dishonoring him" and TAYLOR threatened to expel F-2 from KOGGC.

dd. On or about October 22, 2024, TAYLOR told BRANNON to "[p]ut [F-2] out on the street now !! Confront her immediately!! This is it I think she needs to be sent back to live with her father !! She's not willing to obey .. Go to her mom and tell her to find her another place to go !! She is choosing to be nothing than a distraction here !! She's defied me for the last time !! Put her outside on the street right now .."

ee. On or about October 22, 2024, TAYLOR told F-2, "lol YOU SOO

STUPID [F-2] .. YOU ARE GOING TO HELL .. You're done here."

ff. On or about October 22, 2024, TAYLOR and BRANNON texted each other regarding BRANNON collecting F-2's devices and deleting messages between F-2 and TAYLOR. BRANNON confirmed that BRANNON had deleted multiple messages between TAYLOR and F-2 and had changed passwords on applications so that F-2 could no longer access them.

38. TAYLOR, BRANNON, KLEIN, and other members of the conspiracy harassed KOGGC members who left KOGGC and retaliated against those who spoke out against TAYLOR and KOGGC. For instance, in a series of texts on or about January 8, 2019, TAYLOR and BRANNON worked together to disseminate sexually explicit photos and images TAYLOR received from women after the women publicly disclosed information about TAYLOR and KOGGC. The following are excerpts from the relevant texts:

- a. TAYLOR texted BRANNON, "We need to reach out to [F-3] and show her videos and pictures that someone found of her that is being leaked since she wants to tell it all they are showing everything !!" BRANNON replied, "Ok yes Sir!" TAYLOR then explained, "But we have to do it through anonymous."
- b. A few minutes later, BRANNON texted to TAYLOR, "[F-4] should

never ever say or do anything to you”; “She should have kept her mouth shut!”; “Same with [F-3] ughh.”

c. TAYLOR also texted images of two additional women to BRANNON.

d. BRANNON sent an image back to TAYLOR. He remarked, “This is nothing”; “They have to be naked.”

e. TAYLOR directed BRANNON, “We need for everyone to create another Facebook profile with a different picture (not their picture) etc that is not link to none of our people so we can spread these pictures of [F-4] .. none stop.”

f. BRANNON responded to TAYLOR, “I just think we should wait to share it with everyone because I don’t want it to come back on revenge porn or anything can try and do and trace it back to you through our IP address. I’m just trying to protect you that’s all!” TAYLOR responded that he agreed.

39. TAYLOR also shared explicit images he received with BRANNON, other female laborers, and other members of KOGGC. TAYLOR then used the sexually explicit images to control and exploit female laborers.

40. On or about April 2020, V-2 refused to produce sexually explicit images for TAYLOR because he had shared sexually explicit images of other women with her. TAYLOR assured V-2 that she could trust him. The following are

excerpts from the relevant texts:

- a. TAYLOR told V-2, "I just want to see your wet pussy."
- b. V-2 responded, "I trust you my love.... but..... not with pics/video of me.... it just makes me nervous... I'm sorry."
- c. TAYLOR told V-2, "[i]t's because of me showing you pics of others"; "I can't believe you are judging me for being open and trusting you only you like that."
- d. Minutes later, TAYLOR argued that V-2 should trust him "because I only trusted you to be open with you only !!" V-2 responded, "[b]ut my love the biggest reason is because GOD FORBID I get kicked out or you think I've betrayed..... and you use it against me...."; "..... why am I any different than any other woman you've done that to?"

All in violation of Title 18, United States Code, Sections 1594(b) and 1589.

COUNTS TWO THROUGH NINE

(Forced Labor -18 U.S.C. § 1589)

41. The general allegations and paragraphs 13 - 40 are included in these counts.

42. Beginning on or about the dates listed below, and continuing through on or about the corresponding dates indicated below, in the Eastern District of Michigan and elsewhere, the below-named defendants, and others known and

unknown to the Grand Jury, aiding and abetting each other and others, knowingly provided and obtained the labor and services of the victims referenced in each respective count below, whose identities are known to the Grand Jury, by any one of, and by any combination of, the following means — (1) force, threats of force, physical restraint, and threats of physical restraint to that person and another person; (2) serious harm and threats of serious harm to that person and another person; (3) abuse and threatened abuse of law and legal process; and (4) any scheme, plan, and pattern intended to cause the person to believe that, if the person did not perform such labor and services, that person and another person would suffer serious harm and physical restraint; and attempted to do so:

<u>COUNT</u>	<u>DEFENDANT</u>	<u>VICTIM</u>	<u>APPROXIMATE DATES OF FORCED LABOR</u>
TWO	D-1 TAYLOR D-2 BRANNON	V-1	On or about 2016 through on or about 2022
THREE	D-1 TAYLOR D-2 BRANNON	V-2	On or about 2012 though on or about 2023
FOUR	D-1 TAYLOR D-2 BRANNON	V-3	On or about 2013 through on or about 2023
FIVE	D-1 TAYLOR D-2 BRANNON	V-4	On or about 2016 through on or about 2019
SIX	D-2 TAYLOR D-2 BRANNON	V-5	On or about 2016 through on or about 2017
SEVEN	D-1 TAYLOR D-2 BRANNON	V-6	On or about 2017 through on or about 2019
EIGHT	D-1 TAYLOR	V-7	On or about 2009 through on or about 2018
NINE	D-1 TAYLOR	V-8	On or about 2010 through on or about 2015

In violation of Title 18, United States Code, Sections 1589 & 2.

COUNT TEN

(Money Laundering Conspiracy - 18 U.S.C. § 1956(h))

D-1 DAVID TAYLOR

D-2 MICHELLE BRANNON

43. The general allegations and paragraphs 13 - 40 are included in this count.

44. Beginning no later than 2018 and continuing through at least July 2025, in the Eastern District of Michigan and elsewhere, the defendants, DAVID TAYLOR and MICHELLE BRANNON, knowingly conspired and agreed with each other and with other persons and entities known and unknown to the Grand Jury to commit money laundering offenses against the United States in violation of Title 18, United States Code, Section 1957, specifically, to knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate commerce and foreign commerce, in criminally derived property of a value greater than \$10,000, said property being derived from specified unlawful activity, that is, forced labor, in violation of Title 18, United States Code, Section 1589, in violation of Title 18, United States Code, Section 1957.

THE MANNER AND MEANS OF THE CONSPIRACY

45. The manner and means used to accomplish the objective of the conspiracy included, among others, the following:

- a. As a result of TAYLOR's and BRANNON's commission of forced labor offenses, in violation of Title 18, United States Code, Section 1589, TAYLOR and BRANNON caused millions of dollars in proceeds of those forced labor offenses — in the form of donations — to be deposited into accounts held in the name of JMMI and KOGGC.
- b. TAYLOR and BRANNON, along with others known to the Grand Jury, were authorized signatories on the accounts held in the name of JMMI and KOGGC.
- c. TAYLOR and BRANNON used the proceeds of the forced labor offenses and deposited into JMMI/KOGGC accounts for monetary transactions:
 - i. to support TAYLOR's extravagant lifestyle; and
 - ii. to enrich BRANNON.
- d. For example, TAYLOR and BRANNON conspired to purchase and purchased, among other things, a boat, luxury cars, ATVs, and jet skis via monetary transactions, while knowing that these monetary transactions involved criminally derived property and which transactions in fact involved proceeds of forced labor offenses, committed in violation of Title 18, United States Code, Section 1589, in amounts greater than \$10,000.

e. The monetary transactions described in the above two subparagraphs included the following transactions:

ITEM	TRANSACTION AMOUNT	ON OR ABOUT DATE
Mercedes Benz	\$63,195.94	4/21/2018
Bentley Continental	\$70,000 downpayment	5/04/2018
Crownline Boat	\$105,595	11/08/2019
Bentley Continental	\$15,000 downpayment	6/29/2020
Bentley Mulsanne	\$50,000 downpayment	6/30/2020
Mercedes Benz	\$14,908	9/09/2020
Mercedes Benz	\$13,695	9/09/2020
Mercedes Benz	\$12,485	9/09/2020
5 ATVs	\$31,805	6/17/2021
2 Jet Skis and 1 Jet Ski Trailer St. Louis Power Sports	\$24,332	6/17/2021
2 Jet Skis and 1 Jet Ski Trailer Holzhauer Pro Motorsports	\$24,962.20	6/17/2021
125 lbs. of Super Colossal Red King Crab Legs, 6 Seafood Shears, and 30 Crab Cutters	\$10,353.44	9/30/2021
Rolls Royce Cullinan	\$123,028.09 lease signing payment	5/21/2024
Bulletproof Automotive	\$33,930	5/31/2024
Bulletproof Automotive	\$32,630	7/08/2024
Bulletproof Automotive	\$37,500	7/24/2024
Bulletproof Automotive	\$18,302.76	2/14/2025

In violation of Title 18, United States Code, Section 1956(h).

CRIMINAL FORFEITURE ALLEGATIONS

(18 U.S.C. § 982(a)(1), 18 U.S.C. § 1594(d))

D-1 DAVID TAYLOR

D-2 MICHELLE BRANNON

D-3 KATHLEEN KLEIN

The above allegations contained in this Indictment are included here for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(1) and 18 U.S.C. § 1594(d).

Upon conviction of the offense set forth in Count One of this Indictment, defendants DAVID TAYLOR, MICHELLE BRANNON, and KATHLEEN KLEIN shall forfeit to the United States, pursuant to 18 U.S.C. § 1594(d)(1) and (2), any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property, pursuant to 18 U.S.C. § 1594(d)(1), and any property, real or personal, that constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such violation, or any property traceable to such property, pursuant to 18 U.S.C. § 1594(d)(2).

Upon conviction of the offenses set forth in Counts Two through Nine of this Indictment, defendants DAVID TAYLOR and MICHELLE BRANNON shall forfeit to the United States, pursuant to 18 U.S.C. § 1594(d)(1) and (2), any

property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property, pursuant to 18 U.S.C. § 1594(d)(1), and any property, real or personal, that constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such violation, or any property traceable to such property, pursuant to 18 U.S.C. § 1594(d)(2).

Upon conviction of the offense in violation of 18 U.S.C. § 1956(h), set forth in Count 10 of this Indictment, the defendants DAVID TAYLOR and MICHELLE BRANNON shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

Forfeiture includes, but is not limited to, a forfeiture money judgment against defendants DAVID TAYLOR, MICHELLE BRANNON, and KATHLEEN KLEIN in favor of the United States, in an amount representing (a) the gross proceeds obtained by each defendant as a result their respective violations of Counts One through Nine of this Indictment and (b) a sum of money equal to the value of the property involved in the respective violations of Count 10 of this Indictment.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(b)(1).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

JEROME F. GORGON JR.
United States Attorney

s/ John K. Neal

JOHN K. NEAL

Assistant United States Attorney
Chief, Anti-Corruption Unit

s/ Sarah Resnick Cohen

SARAH RESNICK COHEN

s/ Craig Wininger

Craig Wininger
Assistant United States Attorneys
Anti-Corruption Unit

A. TYSEN DUVA
Assistant Attorney General
Department of Justice
Criminal Division

s/ Lindsey Roberson

LINDSEY ROBERSON

Trial Attorney
Human Rights and Special
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1301 New York Avenue, NW, Suite
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s/ Adriana Dydell

ADRIANA DYDELL

Assistant United States Attorney

Chief, Money Laundering and

Asset Recovery Unit

211 W. Fort St., Ste. 2001

Detroit, MI 48226

313-226-9100

Dated: July 29, 2026

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 25-cr-20560
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
☐ Yes ☒ No	AUSA's Initials: C.W.

Case Title: USA v. Taylor

County where offense occurred : Wayne County and Elsewhere

CLERK'S OFFICE
DETROIT

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]

☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 25-cr-20560

Judge: Susan K. DeClercq

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

July 29, 2026
Date

s/ Craig Wining

Craig Wining
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3277
Phone: 313-226-9569
Fax:
E-Mail address: craig.wining@usdoj.gov
Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.