

truck. The trucks had been shown to **Bush** and Thibodeaux who inquired about the trucks under false identities the day prior. Thibodeaux was shown the 2019 F-250 and **Bush** was shown the 2020 F-250. **Bush** and Thibodeaux kept the actual key fobs for the trucks, switching them out for inactive key fobs that they purchased on the internet in advance, which they returned to the salesman after they had been shown the trucks. **Bush** and Thibodeaux then provided fraudulent information for credit applications and left, stating they would return to purchase the trucks the following day. That night, **Bush** and Thibodeaux returned to the dealership around 1:00 a.m. and drove the trucks off of the lot using the stolen key fobs. **Bush** and Thibodeaux drove the trucks from the dealership in D'Iberville across state lines back to New Orleans in violation of 18 U.S.C. § 2313. **Bush** and Thibodeaux then met with Sylvester, who paid them each approximately \$8,000 in cash for the trucks. Sylvester rebranded the trucks and sold them to buyers in Houston and New Orleans. The 2020 F-250 stolen by **Bush** was recovered by New Orleans police the day after **Sylvester** sold it.

On May 15, 2020, **Bush** and Thibodeaux went to a dealership in Brandon, Mississippi, to steal a gray 2015 Chevrolet Corvette and a black 2019 Dodge Challenger R/T Scat Pack. Again, **Bush** and Thibodeaux posed as customers and switched the key fobs. After midnight, they returned to steal the cars. **Bush** took the Corvette and Thibodeaux took the Challenger. Thibodeaux abandoned the Challenger on the side of the road after a police officer began pursuing him for speeding. **Bush** evaded the speed trap and drove the Corvette across state lines back to New Orleans. Thibodeaux later sold the Corvette to an intermediary and split the proceeds with **Bush**. The car was recovered from a local drug dealer who purchased it from the intermediary.

On June 29, 2020, **Bush** and Thibodeaux stole a black 2016 Dodge Challenger SRT Hellcat from a dealership in Jackson, Alabama. Again, **Bush** and Thibodeaux switched the key fobs at the

dealership, enabling them to return later that night to steal the Hellcat. Butler replaced the Hellcat's Vehicle Identification Number with a fraudulent one. The Hellcat was recovered from the above referenced drug dealer.

The following is a list of the vehicles stolen by **Bush** that were cloned with fake VIN plates and fake VIN stickers, and sold to various buyers at a discount as part of the subject conspiracy:

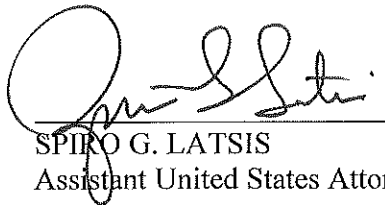
Make/Model	Value
2019 Dodge Challenger Scat Pack	\$50,000
2016 Dodge Challenger SRT Hellcat	\$50,000
2019 Chevrolet Corvette Z06	\$93,000
2016 Dodge Challenger Scat Pack	\$33,000
2018 Cadillac Escalade	\$50,000
2016 Dodge Challenger SRT Hellcat	\$50,000
2020 Ford F-250 Platinum 4x4	\$80,000
2016 Dodge Challenger SRT Hellcat	\$50,000
2019 Chevrolet Camaro ZL1	\$67,000
2019 Chevrolet Corvette Stingray	\$80,000
2017 Dodge Charger Daytona	\$49,000
2019 Nissan Armada	\$63,000
2020 Ford F-250 Platinum 4x4	\$82,000
2017 Chevrolet Corvette Grand Sport	\$60,000
2016 Chevrolet Corvette Stingray	\$45,000
2019 Ford F-250 Platinum 4x4	\$75,000
2015 Chevrolet Corvette Z06	\$56,000
2016 Dodge Challenger SRT Hellcat	\$50,000
2017 Chevrolet Corvette Z06	\$75,000

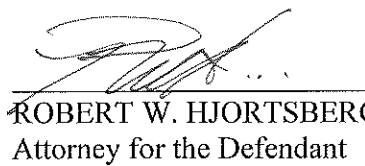
In total, these stolen vehicles had an approximate market value of \$1,158,000.00 at the time of their theft. At trial, testimony and physical evidence would be produced to show that the VIN numbers on many of the vehicles listed above were altered in violation of 18 U.S.C. § 511.


LIMITED NATURE OF FACTUAL BASIS

This proffer is not intended to constitute a complete statement of all facts known by the government, but rather a minimum statement of facts intended to prove the necessary factual

predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for **Bush's** plea of guilty.

 Aug 23, 2022
SPIRO G. LATSIS Date
Assistant United States Attorney

 8/23/2022
ROBERT W. HJORTSBERG Date
Attorney for the Defendant

 8/23/2022
JONATHAN BUSH Date
Defendant