

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 21-86
	*	
v.	*	SECTION: "G"
	*	
AARON THIBODEAUX	*	
	*	
	*	
	*	
	*	
	*	

FACTUAL BASIS

Defendant **Aaron Thibodeaux** has agreed to plead guilty as charged to Count One of the indictment charging him with conspiracy in violation of Title 18, United States Code, Section 371.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant.

Aaron Thibodeaux ("**Thibodeaux**") was a prolific car thief in New Orleans, who stole, transported across state lines, and sold vehicles in furtherance of a conspiracy between himself and four other indicted co-conspirators. **Thibodeaux** and Jonathan Bush ("**Bush**") stole vehicles for resale by Tawuan Sylvester ("**Sylvester**"). Gregory Butler ("**Butler**") provided Sylvester with fraudulent registrations, temporary license plates, VIN plates, and VIN stickers, which he acquired from Keinan Chapman ("**Chapman**"). Butler also registered the stolen vehicles with the Office of Motor Vehicles through Public Tag Agencies.

In April or March of 2020, Sylvester contacted Bush and **Thibodeaux** requesting two F-Series Ford trucks. On March 5, 2020, the manager of a Ford dealership in D'Iberville, Mississippi reported the theft of a white 2019 Ford F-250 pickup truck and a silver 2020 Ford F-250 pickup

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Defense Counsel Ry

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 **Thibodeaux** 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
2018 Dodge Challenger SRT Hellcat	\$59,000
2016 Dodge Challenger Scat Pack	\$33,000
2016 Dodge Challenger Scat Pack	\$38,000
2017 Dodge Charger SRT Hellcat	\$28,000
2019 Nissan Armada	\$63,000
2017 Chevrolet Corvette Stingray & 2018 Chevrolet Corvette Z06	\$116,000
2017 Chevrolet Corvette Grand Sport	\$60,000
2016 Chevrolet Corvette Stingray	\$45,000
2015 Chevrolet Corvette Z06	\$56,000
2019 Dodge Challenger Scat Pack	\$32,000
2017 Chevrolet Z06	\$74,000
2016 Chevrolet Corvette Z06	\$70,000
2019 Chevrolet Camaro ZL1	\$54,000
2019 Ford F-250 Platinum 4x4	\$75,000
2019 Ford F-250	\$72,000
2016 Dodge Challenger SRT Hellcat	\$50,000

In total, these stolen vehicles had an approximate market value of \$925,000.00 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

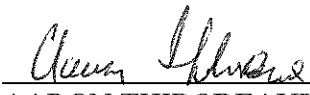
predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for **Thibodeaux's** plea of guilty.

 Aug 24, 2022

Date
SPIRO G. LATSIS
Assistant United States Attorney

 8/24/2022

Date
RACHEL MARIE YAZBECK
Attorney for the Defendant

 8/24/22

Date
AARON THIBODEAUX
Defendant