

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 21-86
v.	*	SECTION: "G"
TAWAUN A. SYLVESTER	*	
a/k/a "Polo"	*	
a/k/a "T"	*	

* * *

FACTUAL BASIS

The defendant, TAWAUN A. SYLVESTER (SYLVESTER), has agreed to plead guilty as charged to Count One of the Superseding Indictment charging him with conspiracy in violation of Title 18, United States Code, Section 371.

Should this matter have proceeded to trial, the United States 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 Superseding Indictment now pending against the defendant:

In February of 2020, the Louisiana State Police Insurance Fraud/Auto Theft Unit New Orleans Field Office (LSP-IFAT) and Homeland Security Investigations (HSI) Special Agents uncovered a criminal organization that was stealing vehicles from dealerships and rental car facilities in Louisiana, Mississippi, Alabama, and Georgia. After stealing the cars, the cars were retitled under fraudulent Vehicle Identification Numbers (VINS) with the Louisiana Office of Motor Vehicles. Once the cars were retitled and cloned with fraudulent VINS, the cars were resold to buyers in the New Orleans metro area at discounted prices.

AUSA	<u>SGZ</u>
Defendant	<u>TAS</u>
Defense Counsel	<u>WBT</u>

Based on investigative leads, seizures of stolen vehicles, and reviews of car titles and registrations, the agents identified the members of the criminal organization that were ultimately charged in this matter. Jonathan Bush (Bush) and Aaron Thibodeaux (Thibodeaux) were prolific car thieves from the New Orleans metro area. Bush and Thibodeaux would identify cars they wanted to steal that were listed for sale on the internet sites of various car dealerships located throughout Louisiana and neighboring states. After identifying the target vehicles, Bush and Thibodeaux would travel to the dealerships and pose as customers. The salesmen would give them keys to the target vehicles so they could inspect them or take them for a test drive. After they finished viewing the vehicles, Bush and Thibodeaux would give the car salesman fake key fobs that looked authentic. Sometime after the car dealerships closed, Bush and Thibodeaux would return with the real keys, steal the target vehicles, and drive them across state lines into New Orleans.

After stealing the vehicles, Bush and Thibodeaux would sell them to **SYLVESTER**, a middleman for the organization. **SYLVESTER** would then clone and resell the stolen vehicles to local buyers, or he would give them to his family members. Gregory Butler (Butler), who served as a runner and salesman for this organization would often provide **SYLVESTER** with fraudulent car registrations, temporary license plates, VIN plates, and VIN stickers that he would use to clone the vehicles. Butler would acquire those fraudulent documents used to clone the vehicles from Keinan Chapman (Chapman), a resident of Atlanta. Butler would also assist **SYLVESTER** and other buyers in registering the cloned cars with the Office of Motor Vehicles (OMV) through

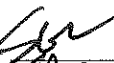

AUSA SBZ
Defendant AS
Defense Counsel WBT

notaries he knew working for Public Tag Agencies in the area. (Public Tag Agencies are third party notary shops that are licensed by the State of Louisiana to register new vehicles, renew registrations, issue license plates and transfer car titles on behalf of the OMV.)

After identifying **SYLVESTER** as a middleman in the criminal organization, the State Troopers and Special Agents obtained a warrant to search **SYLVESTER**'s residence. On May 4, 2020, the agents executed a search warrant at **SYLVESTER**'s residence. During the search, **SYLVESTER** cooperated with the agents and turned over all the stolen cars he had in his possession. Several days after the search, **SYLVESTER** turned over several stolen cars that he cloned and sold to friends and family. The following is a list of the stolen vehicles that **SYLVESTER** acquired, rebranded, and sold as part of his involvement in the subject conspiracy:

Make/Model	Value
2016 Dodge Challenger 392 Scat Pack Edition	\$38k
2019 Dodge Ram 4x4	\$50k
2019 Ford Mustang	\$35k
2017 Jeep Wrangler	\$30k
2019 Dodge Charger SXT	\$30k
2020 Ford F-250 4x4	\$60k
2018 Dodge Challenger SRT Hellcat	\$60k
2019 Nissan Armada	\$64k
2019 Dodge Charger RT	\$35k
2016 Chevrolet Silverado 4x4	\$50k
2020 Ford F-250 4x4 (silver)	\$85k
2019 Ford F-250 4x4 (white)	\$72k

\$609,000.00 approximate total value of stolen vehicles.

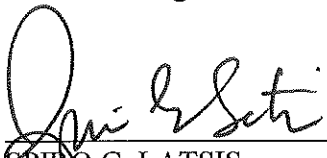
AUSA 
 Defendant 
 Defense Counsel WBI

In total, these stolen vehicles had an approximate market value of \$609,000.00 at the time of their recovery. At trial, testimony and physical evidence would be produced to show that the VIN numbers on all the vehicles listed above were altered in violation of 18 U.S.C. § 511.


In addition to the foregoing, the government would also prove that on March 5, 2020, Bush and Thibodeaux stole a 2019 white Ford F-250 pickup truck and a silver 2020 F-250 pickup truck from a dealership in D'Iberville, Mississippi, and transported them back across states lines to SYLVESTER in violation of 18 U.S.C. § 2313. After paying Bush and Thibodeaux for their services, SYLVESTER cloned the silver Ford F-250 with fake a VIN and sold it to a buyer in Texas. SYLVESTER sold the white Ford F-250 to a buyer in New Orleans, but it was recovered the following day by the New Orleans Police Department.

LIMITED NATURE OF FACTUAL BASIS

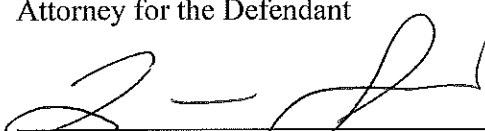
This proffer is not intended to constitute a complete statement of all facts known by the government, but rather a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for SYLVESTER's plea of guilty.



SPIRO G. LATSIS Date
Assistant United States Attorney



WARNER THOMPSON Date
Attorney for the Defendant



TAWAUN A. SYLVESTER Date
Defendant