

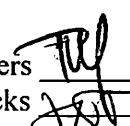
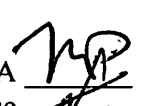
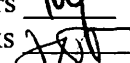
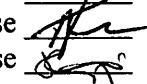

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 18-223
	*	SECTION: "J"
v.	*	
DANIEL TANASE	*	
GABRIELLA TEKSE	*	
	*	
	*	
	*	

FACTUAL BASIS

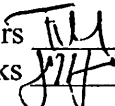
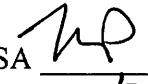
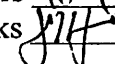


Defendants DANIEL TANASE ("TANASE") and GABRIELLA TEKSE ("TEKSE") have agreed to plead guilty to a Bill of Information. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, the following acts occurred within the jurisdiction of the Eastern District of Louisiana.

On or about June 19, 2018, Jefferson Parish Sheriff's Office (JPSO) Detective Carl Koppeis received a call from Hancock Whitney Bank investigators in reference to two suspects (later identified as TANASE and TEKSE) who had been seen swiping multiple ATM/debit cards at a Hancock Whitney Bank located at 521 Veterans Memorial Blvd., Metairie, Louisiana. Hancock Whitney Bank representatives stated that the two suspects were observed withdrawing cash and entering PIN numbers for each card they were using. Hancock Whitney representatives reported that the two suspects had been seen at the bank in a vehicle, a black Toyota Prius, LA License Plate 312ALN. Hancock Whitney provided surveillance photographs of the individuals that were taken while they were at the ATM at the Metairie branch.

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Thompson-Hicks		Tanase	
		Tekse	

Det. Carl Koppeis ran the plate of the vehicle and learned that it belonged to an individual who was a resident of the New Orleans area (Witness 1). Det. Koppeis learned that Witness 1 was a member of the U.S. Coast Guard. Det. Koppeis contacted Witness 1, who agreed to meet with law enforcement. Det. Koppeis noted that Witness 1 did not match the appearance of the two individuals who were seen using multiple ATM cards at the Metairie Hancock Whitney Bank. Witness 1 explained to Koppeis that he leased his car through a phone app called Turo. Witness 1 confirmed that he had leased his car to an individual named "Daniel Catalin Tanase" (TANASE) according to his Romanian driver's license provided through the app. TANASE was supposed to return the vehicle to Witness 1 on June 22, 2018. TANASE also provided a phone number through the app.

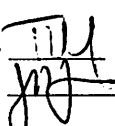
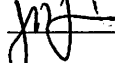



In order to locate the subjects, Det. Koppeis obtained a search warrant to obtain the cell site data for the phone number provided by TANASE. On June 19, 2018, JPSO detectives located the Prius in the parking lot located near 1309 Carrolton Ave., Metairie, LA. Investigators positively identified the vehicle as the vehicle that the two suspects were observed in when they were accessing the ATM at the Metairie branch of HancockWhitney Bank. Investigators knocked at the door of Apartment #227, and when the door was answered, investigators saw the two suspects (TEKSE and TANASE) inside the residence. Investigators spoke to a third person who was inside the apartment (Witness 2), who actually lived at the apartment. Witness 2 stated that he rented out one of his bedrooms to TANASE and TEKSE as an Airbnb rental. Witness 2 showed investigators text messages that corroborated what he told them. Investigators secured the residence for safety and then obtained a search warrant. They also obtained a search warrant for the Prius that was observed being driven by the suspects at the bank.

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During the search, investigators located eighty-one (81) gift cards, each with a sticker and a personal identification number (PIN) inside the Prius. Investigators also located approximately \$32,615.25 in assorted United States currency in the room **TANASE** and **TEKSE** were staying in at the apartment. This cash was in addition to approximately 960.00 euros found in their possession. Both suspects advised that they were from Hungary but carried Romanian identification cards. The suspects were transported to the Jefferson Parish correctional center for proper booking.

Continuing on June 20, 2018, investigators used the assistance of a USSS employee who is a native Hungarian speaker to translate and communicate with both **TANASE** and **TEKSE**. **TANASE** and **TEKSE** were each interviewed separately after they were read their *Miranda* rights in Hungarian, and they each acknowledged their rights and agreed to speak to investigators. **TANASE** stated he found the cards and PINs on the ground and recognized them to be bank debit cards. **TANASE** stated he tried the cards at an ATM to see if they worked. **TEKSE** stated she was invited to the U.S. by **TANASE**, and he was already in possession of all the cards when she arrived. **TEKSE** stated the ATM withdrawals that she conducted were under **TANASE'S** instructions.

Investigators were able to scan 80 of the cards and determined that all of them were re-encoded with bank cards from numerous financial institutions throughout the U.S. Agents contacted Iberia Bank, which reported that one of the card numbers ending in 4155 had been used four times between June 18 and June 19, 2018, to withdraw cash. That card number had been closed, because the card owner (Victim A) reported that the withdrawals were not authorized and therefore fraudulent.

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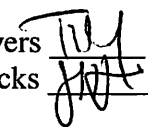
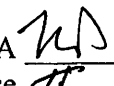
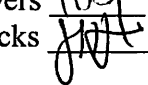
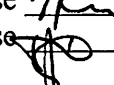

Investigators determined that the June 19<sup>th</sup> withdrawals had been performed at a Capital One bank branch in Metairie, Louisiana. Investigators contacted Capital One, which provided surveillance photos taken during those transactions. The photos show TANASE using four ATM cards between approximately 7:30 and 7:33 a.m.

Investigators subsequently obtained surveillance photographs from Hancock Whitney showing both TANASE and TEKSE both making multiple withdrawals from ATMs at three different bank branches on June 19, 2018.

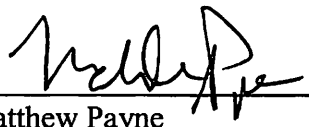
TANASE and TEKSE each admit that they knowingly possessed and used debit card ending in 4155 without lawful authority, in furtherance of a conspiracy to commit access device fraud, knowing that the debit card belonged to another person, namely Victim A.

Limited Nature of Factual Basis

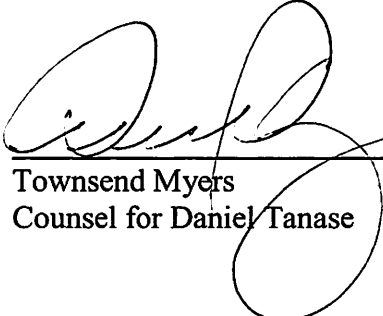
This proffer of evidence is not intended to constitute a complete statement of all facts known by TANASE and TEKSE, and it is not a complete statement of all facts described by TANASE and TEKSE to the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for their guilty pleas. The limited purpose of this proffer

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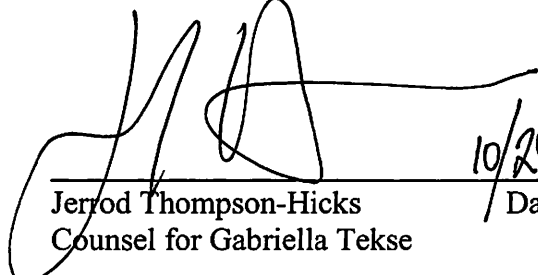
is to demonstrate that there exists a sufficient legal basis for TANASE'S and TEKSE'S pleas of guilty to the charged offense.

  
\_\_\_\_\_  
Matthew Payne  
Assistant United States Attorney


9/28/2018  
Date

  
\_\_\_\_\_  
Townsend Myers  
Counsel for Daniel Tanase


10/29/18  
Date

  
\_\_\_\_\_  
Jerrod Thompson-Hicks  
Counsel for Gabriella Tekse

10/29/18  
Date

  
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Daniel Tanase  
Defendant

10/29/18  
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Gabriella Tekse  
Defendant

10/29/18  
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