

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA** \* **CRIMINAL NO. 19-22**  
**v.** \* **SECTION: "H"**  
**DANIEL VANSLYKE** \*  
\* \* \*

**FACTUAL BASIS**

The defendant, **DANIEL VANSLYKE** (hereinafter, the "defendant" or "**VANSLYKE**"), has agreed to plead guilty as charged to the Indictment now pending against him, charging him with theft of government funds, in violation of Title 18, United States Code, Section 641. Both the Government and the defendant, **VANSLYKE**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment now pending against the defendant:

The Government would show through testimony and documents that the United States Department of Veterans Affairs (VA) is, and was, at the time of the offense, an agency or department of the United States. The Government would also show through testimony and documents, that Michael Vanslyke, was a United States military veteran who was entitled to receive and in fact had been receiving VA benefits by way of direct deposit into his bank account until the time of his death in 2015.

AUSA \_\_\_\_\_  
Defendant \_\_\_\_\_  
Defense Counsel \_\_\_\_\_

At all times material herein, **VANSLYKE** was the son of Michael Vanslyke, and all of the facts set forth in this Factual Basis occurred within the Eastern District of Louisiana.

This investigation was initiated in September 2016, based on an anonymous complaint. It was alleged that veteran and VA payee, Michael Vanslyke (“the veteran”), died on November 10, 2015, but his son, **VANSLYKE**, was spending the ongoing VA benefits via a prepaid debit card.

VA – Office of Inspector General (“OIG”) investigated the matter and confirmed that after the veteran’s death in November of 2015, **VANSLYKE** or someone on his behalf had twice filled out VA Form 21-4140 Employment Questionnaires in 2016 and sent them back to the VA, posing as the veteran, in order to keep the VA benefits accruing to Michal Vanslyke.

Witness 1 would testify that **VANSLYKE** took possession of his father’s wallet while the veteran was hospitalized just prior to his death.

**VANSLYKE**’s girlfriend, Jessica Jarrell was interviewed by VA-OIG on February 1, 2017. She admitted to transferring funds from the veteran’s account into hers and to using the veteran’s debit card after his death for the benefit of her and **VANSLYKE**.

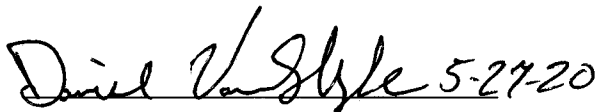
Witness 2 would further testify that he/she observed **VANSLYKE** contact the bank associated with the veteran’s debit card and ask about balances, etc. Witness 2 would also testify that he/she saw **VANSLYKE** in possession of the veteran’s debit card after his death.

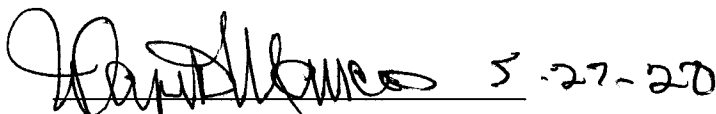
In addition, photographs, and videos from various bank/stores, and NetSpend transaction records support the allegation that **VANSLYKE** used his father’s debit card after his death. For example, **VANSLYKE** was photographed using his father’s debit card at ATM machines and in retail establishments.

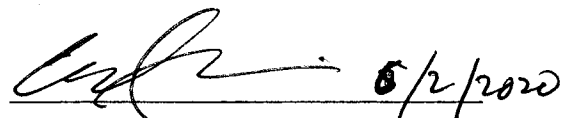
Because of the preliminary interviews/investigation, VA-OIG requested that the benefits be terminated on Jan. 25, 2017. The VA stopped the payments on Jan. 31, 2017, effective to Nov.

1, 2015, creating an overpayment of \$46,051.92. These funds were deposited into the veteran's bank account that VANSLYKE had access to via Michael Vanslyke's debit card, and the funds were converted to VANSLYKE's own use.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from Special Agents from VA – OIG, VA employees, VA business records, bank surveillance and records, and witnesses with knowledge of the facts set forth above.

  
DANIEL VANSLYKE (Date)  
Defendant

  
WAYNE MANCUSO (Date)  
Attorney for Defendant Vanslyke

  
EDWARD J. RIVERA (Date)  
Assistant United States Attorney