

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 20-135
v.	*	SECTION: "B"
SHAWANDA DOVE	*	
a/k/a "Shawanda McKay"	*	
a/k/a "Shawanda Wilson Dove Cortez"	*	
	* * *	

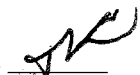


FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

COUNT 1

During the relevant time, the defendant, Sonya Dyson Evans, was employed by the Tangipahoa Parish Sheriff's office in the Criminal Records Division as a supervisor. In this position, Dyson Evans was responsible for the preparation of appearance bonds to obtain the release of defendants from jail. This included verifying the availability of property to be utilized and the ability of a surety to secure a bond. In this capacity, Dyson Evans was a "public employee" and a "person in a position of public authority" as those terms are defined under the laws of the State of Louisiana. See La. Rev. Stat. §14:118(B).

SHAWANDA DOVE, a/k/a "Shawanda McKay", a/k/a "Shawanda Wilson Dove Cortez" (DOVE) was a Tangipahoa Parish resident. She did not have a licensed bail bonds business nor did she utilize her own property as collateral for bonds. However, DOVE was known by parish residents as a person who, for a fee, was able to obtain property bonds, without a legitimate surety or property for collateral. She did this by obtaining fraudulent property bonds from Sonya Dyson Evans and others.

AUSA	
Defendant	
Defense Counsel	

Beginning not later than about January 2016, and continuing through January 2017, **DOVE** received numerous calls from individuals in jail or their family members requesting a bond. **DOVE** would contact Dyson Evans by cellphone to request a bond for the incarcerated person. Dyson Evans would assess the bond requirements set by the court, and give **DOVE** a price for the bond. This price was then communicated to the requesting party by **DOVE**. **DOVE** and Dyson Evans regularly communicated by cellphone, a facility of interstate commerce, to negotiate the details of these transactions.

When the family of the incarcerated person paid the fee to **DOVE**, Dyson Evans would prepare the bond paperwork. For collateral for these bonds, Dyson Evans utilized properties belonging to individuals who were unaware of the bond, did not know the incarcerated person, and had not given their consent for the use of their properties. Dyson Evans forged the property owners' signatures and notarized the fraudulent bond documents.

Dyson Evans then delivered the forged bond paperwork to **DOVE** in exchange for money. The money received was not properly recorded in the Criminal Records Division, but instead kept by Dyson Evans or shared with other employees. **DOVE**, who also retained a portion of the money, then provided the bond paperwork to the inmate's relative, who would take it to the jail where the family member would be released.

In total, **DOVE** and other coconspirators received not less than \$31,000 in bribe payments. **DOVE** paid Dyson Evans to influence her conduct and cause her to take the official act of creating and providing fraudulent property bonds for incarcerated individuals.

## COUNT 2

On or about February 26, 2020, as part of an ongoing federal investigation, a cooperating defendant of the Livingston Parish Sheriff's Office ("J.L.") conducted a controlled purchase of

methamphetamine from **DOVE**'s son Aaron Nakeenen WOMACK, a/k/a "Aarone Nakeenan Womack" ("WOMACK"), at a residence located at [REDACTED] Ponchatoula, Louisiana. Thereafter, law enforcement executed a federal search warrant at [REDACTED] and arrested WOMACK for violations of the Federal Controlled Substances Act. WOMACK was charged via criminal complaint in Criminal No. 20-mj-36, in the United States District Court for the Eastern District of Louisiana, on February 27, 2020. A federal grand jury later returned an indictment against WOMACK arising from this same conduct on March 6, 2020.

On February 27, 2020, law enforcement was monitoring the social media accounts of WOMACK's family and associates for evidence relating to WOMACK. Law enforcement observed and preserved two videos on **DOVE**'s public Facebook account in which **DOVE** communicated threats to J.L., and had been originally broadcast live. In a video time-stamped by Facebook as February 27, 2020, at 2146 hours, **DOVE** showed images of J.L. that were on a cellular telephone to the camera recording the Facebook video. As **DOVE** was showing these photographs of J.L., **DOVE** stated that she had to start the video over because she had to "tag" J.L. "Tagging" another Facebook user in a photograph or video on Facebook associates the tagged user with the post, which sends a notification to the tagged user of the content and allows others to see and comment on the post. Law enforcement confirmed that the Facebook user account "tagged" in **DOVE**'s video was indeed J.L.'s account.

**DOVE** then proceeded to solicit information from viewers about J.L., and stated J.L.'s full name, nickname, and place of residence. **DOVE** further stated that her son "Aaron" (i.e., WOMACK) had been arrested the previous day and J.L. had set him up. **DOVE** confirmed that she was not speculating about these facts because WOMACK had informed **DOVE** from jail that

J.L. had been cooperating with law enforcement, and that he was in federal custody. **DOVE** further stated that she had tagged J.L.'s Facebook account because J.L. was no longer answering the telephone. **DOVE** recounted her history of friendship with J.L. and provided **DOVE**'s telephone number of [REDACTED] requesting that viewers call **DOVE** at that number if they knew of J.L.'s whereabouts. **DOVE** further stated that she would "knock the f\*ck out of" that "b\*tch," meaning J.L. "You can take it as a threat, it's a promise. I promise to get you," **DOVE** further stated. **DOVE** further acknowledged that she was aware J.L. was cooperating with law enforcement because she had spoken with J.L. on the telephone after WOMACK's arrest.

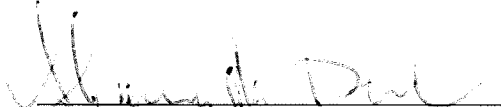
In a second Facebook video time-stamped as February 27, 2020, at 2204 hours, **DOVE** reiterated that J.L. "set up" WOMACK, and that **DOVE** had received a message from WOMACK confirming that J.L. had set him up. **DOVE** once again stated that WOMACK was in federal custody, and "that big fat b\*tch [J.L.] ain't never answered the phone since I talked to her yesterday." Addressing J.L., **DOVE** said, "I don't give a f\*ck how big you is." And later, "I don't give a f\*ck if I gotta hit that b\*tch [J.L.] with my car. I'm gonna hit that b\*tch. I got Progressive. I'm gonna hit that b\*tch, it don't matter. B\*tch, I might can't beat you, cause you big as f\*ck. But guess what b\*tch, we gonna jump your ass. I promise you that. I promise you that, we gonna jump your mother f\*cking \*ss, b\*tch."

After viewing **DOVE**'s Facebook videos described above, law enforcement contacted J.L. to inquire about communications with **DOVE** and to assess J.L.'s safety. On February 28, 2020, investigators conducted a recorded interview with J.L. In addition to the Facebook videos described above, J.L. stated that **DOVE** called J.L. from telephone number [REDACTED] approximately about 20 minutes after WOMACK's arrest. Law enforcement confirmed the


incoming call to J.L.'s phone from **DOVE**'s phone via telephone toll records. J.L. stated that **DOVE** was irate and threatened J.L. According to J.L., **DOVE** said that J.L. was a "marked woman." **DOVE** also stated, "Tell your mama to get ready for another funeral, but this time get two caskets." In February 2020, one of J.L.'s two children had recently died. J.L. understood **DOVE**'s "two caskets" statement to be a threat referring to her life and the life of J.L.'s surviving child as a result of her cooperation in the federal investigation that resulted in the criminal charges against **DOVE**'s son, WOMACK.

At trial the government would introduce testimony from investigating agents concerning WOMACK's drug trafficking; J.L.'s testimony regarding WOMACK's drug trafficking and **DOVE**'s verbal threats to J.L.; **DOVE**'s Facebook videos posted on February 27, 2020; and telephone toll records.

READ AND APPROVED:

  
\_\_\_\_\_  
SHAWANDA DOVE  
Defendant

7/7/21  
Date

  
\_\_\_\_\_  
STEPHEN H. SHAPIRO  
Counsel for Defendant

7/7/21  
Date

  
\_\_\_\_\_  
TRACEY N. KNIGHT  
K. PAIGE O'HALE  
Assistant United States Attorneys

7/7/21  
Date