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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**SEALED
FELONY**

**SUPERSEDING INDICTMENT FOR CONSPIRACY TO TRANSPORT, RECEIVE,
POSSESS AND SELL STOLEN VEHICLES, SALE AND RECEIPT OF STOLEN
VEHICLES AND ALTER AND REMOVE MOTOR VEHICLE
IDENTIFICATION NUMBERS**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 21-86
v.	*	SECTION: "G"
KEINAN NELSON CHAPMAN	*	Violations: 18 U.S.C. § 371
a/k/a Kado		18 U.S.C. § 511
GREGORY BUTLER	*	18 U.S.C. § 2312
TAWAUN A. SYLVESTER	*	18 U.S.C. § 2313
a/k/a Polo a/k/a T	*	18 U.S.C. § 2
JONATHAN BUSH		
a/k/a Joshua P. Martin	*	
AARON THIBODEAUX	*	
	*	
	*	
	*	

The Grand Jury charges that:

COUNT 1
(Conspiracy)

A. AT ALL TIMES MATERIAL HEREIN:

1. The Louisiana Office of Motor Vehicles ("OMV") is the state agency responsible for registering new vehicles, renewing vehicle registrations, issuing license plates and driver's

Fee _____
Process _____
X Dktd _____
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licenses, and transferring car titles. A Vehicle Identification Number (“VIN”) is a code of letters and numbers that identifies a car and is assigned at the time a vehicle is manufactured. Each section of the code provides a specific piece of information about the vehicle, including year, make, model, engine size, and the country and factory where the car was made. Each VIN is unique to the vehicle to which it is assigned. In other words, no two automobiles have the same VIN. The VIN allows the manufacturer and law enforcement to identify the vehicle.

2. Automobiles are required to have the VIN publicly displayed through the windshield on the driver’s side of the vehicle. The VIN is also printed on a sticker which is affixed to the door jamb of the driver’s door.

3. Public Tag Agencies (“PTA”) are licensed and bonded third party businesses authorized by the State of Louisiana to register new vehicles, renew vehicle registrations, issue license plates and driver’s licenses and transfer car titles on behalf the OMV. Public tag agencies are given direct access to Louisiana’s OMV computer systems to allow them to execute their duties on behalf of the State of Louisiana.

4. Megabus is a low-cost operator of coaches that offers bus service between New Orleans, Louisiana and Atlanta, Georgia.

B. THE DEFENDANTS:

1. **KEINAN NELSON CHAPMAN a/k/a Kado (“CHAPMAN”)** formerly resided in New Orleans, and currently is a resident of Atlanta, Georgia.

2. **GREGORY BUTLER (“BUTLER”)** is a resident of New Orleans, Louisiana.

3. **TAWAUN A. SYLVESTER a/k/a Polo a/k/a T (“SYLVESTER”)** is a resident of Marrero, Louisiana.

4. **JONATHAN BUSH a/k/a Joshua P. Martin (“BUSH”)** is a resident of New

Orleans, Louisiana.

5. **AARON THIBODEAUX (“THIBODEAUX”)** is a resident of New Orleans, Louisiana.

C. THE CONSPIRACY:

Beginning in or about January 2019, and continuing until February 2021, in the Eastern District of Louisiana and elsewhere, the defendants, **KEINAN NELSON CHAPMAN a/k/a Kado, GREGORY BUTLER, TAWAUN A. SYLVESTER, a/k/a Polo, a/k/a T, JONATHAN BUSH a/k/a Joshua P. Martin, AARON THIBODEAUX**, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree with each other to:

1. transport in interstate and foreign commerce motor vehicles, knowing the vehicles to have been stolen, in violation of Title 18, United States Code, Section 2312;
2. receive, possess, conceal, store, barter, sell, and dispose of motor vehicles, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313; and
3. knowingly and unlawfully remove, obliterate, tamper with, and alter the vehicle identification numbers from a motor vehicle, in violation of Title 18, United States Code, Section 511.

D. OBJECT OF THE CONSPIRACY:

It was the object of the conspiracy for the defendants and their co-conspirators to unjustly enrich themselves by, among other things: (a) stealing motor vehicles; (b) transporting the stolen vehicles in interstate commerce; (c) selling the stolen motor vehicles; (d) concealing and fraudulently registering the stolen motor vehicles by altering their Vehicle Identification Numbers;

and (e) using the stolen motor vehicles for their own personal benefit and use and for the benefit and use of others.

E. MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY:

The manner and means by which **KEINAN NELSON CHAPMAN a/k/a Kado, GREGORY BUTLER, TAWAUN A. SYLVESTER, a/k/a Polo a/k/a T, JONATHAN BUSH a/k/a Joshua P. Martin, and AARON THIBODEAUX** sought to accomplish the object and purpose of the conspiracy included among other things, the following:

1. The co-conspirators stole cars from original owners, car dealerships and car rental businesses in Louisiana, Mississippi, Alabama, and elsewhere. They assisted in finding buyers for stolen cars and attempted to conceal the scheme from law enforcement and the OMV.

2. The co-conspirators searched car dealership websites for target cars. They then traveled together from Louisiana to the dealerships from which they intended to steal a car, posing as customers, and asking to view and test drive the car they intended to steal.

3. While viewing and test driving the vehicles, one of the co-conspirators distracted the salesperson while another defendant exchanged the vehicle's original key fob with an inoperable "dummy key fob" resembling the original. Later that night, after the dealership closed for the day, the defendants returned to the dealership and used the original key to take the vehicle.

4. After stealing a car, the co-conspirators transported the car across state lines back to Louisiana.

5. In Louisiana, the co-conspirators attempted to conceal the scheme from law enforcement and the OMV by fraudulently registering the stolen cars.

6. To facilitate fraudulent registration, the co-conspirators altered the car's VIN and presented fraudulent documents, including titles and VIN stickers, to notaries employed by PTAs.

F. OVERT ACTS:

In furtherance of and to conceal the conspiracy and to accomplish its purposes, the defendants, and others known and unknown to the Grand Jury, committed at least one of the overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. Between on or about January 26, 2019 to June 12, 2020, **BUTLER** wired **CHAPMAN** approximately \$131,065.00 using the Zelle and Cash App money transfer applications.

2. On or about May 10, 2019, **BUTLER** received an electronic payment in the amount of \$2,000 from a buyer (hereinafter “buyer A”) as a deposit towards the purchase of a 2019 black Chevy Tahoe, bearing Vehicle Identification Number ending in [REDACTED], stolen from the Hertz Rental Car facility located at the Louis Armstrong International Airport on March 13, 2019.

3. On or about May 10, 2019, **BUTLER** purchased bus tickets from Megabus.

4. On or about May 12, 2019, **BUTLER** and buyer A traveled from New Orleans, Louisiana to Atlanta, Georgia, on a Megabus to pay for and retrieve the 2019 black Chevy Tahoe.

5. On or about May 12, 2019, **BUTLER** and buyer A drove the stolen 2019 black Chevy Tahoe from Atlanta to New Orleans.

6. On or about June 3, 2019, **BUTLER** received an electronic payment in the amount of \$1,500 from buyer A as a deposit towards the purchase of a stolen 2018 blue Dodge Challenger RT392, bearing Vehicle Identification Number ending in [REDACTED], previously stolen from the State of Georgia.

7. On or about June 3, 2019, **BUTLER** sent the \$1,500 payment he received from buyer A to **CHAPMAN** as a partial payment for the stolen 2018 blue Dodge Challenger RT392.

8. In or about June 2019, buyer A paid **CHAPMAN** approximately \$17,000 for the stolen 2018 blue Dodge Challenger RT392.

9. In or about June 2019, **BUTLER** and customer A traveled on a Megabus from New Orleans, Louisiana to Atlanta, Georgia to complete the purchase of the stolen 2018 blue Dodge Challenger RT392 from **CHAPMAN**.

10. On or about June 2019, buyer A and **BUTLER** drove the stolen 2018 blue Dodge Challenger RT392 from Atlanta, Georgia, to New Orleans, Louisiana.

11. On an about August 20, 2019, **CHAPMAN** sold the 2019 gray Chevrolet Suburban to a buyer (hereinafter "buyer B") in New Orleans.

12. Between in or about August 2, 2019 and August 20, 2019, **CHAPMAN** replaced the VIN of a 2019 gray Chevrolet Suburban, bearing VIN ending in [REDACTED] that was stolen from the Hertz car rental facility located at Louis Armstrong Airport in Kenner, Louisiana, with a fraudulent VIN ending in [REDACTED]

13. On or about February 29, 2020, **CHAPMAN** received via email a fraudulent Louisiana Insurance Card issued by National General/Imperial Fire Insurance Company for a 2015 white Mercedes-Benz G55 SUV stolen from South Fulton, Georgia, from a car dealer operating a car lot in the New Orleans metro area.

14. In or about March 2020, **SYLVESTER** asked **BUSH** and **THIBODEAUX** to provide him with two stolen F-series Ford pickup trucks.

15. On or about March 4, 2020, **BUSH** and **THIBODEAUX** went into a Ford dealership located in D'Iberville, Mississippi, posing as prospective customers looking to purchase two Ford pickup trucks.

16. On or about March 4, 2020, **BUSH** and **THIBODEAUX** gave the car salesman fake key fobs in place of the real key fobs for the Ford pickup trucks.

17. On or about March 5, 2020, [REDACTED] drove the 2020 silver Ford F-250 pickup truck, bearing Vehicle Identification Number ending in [REDACTED], that he stole from the Ford dealership located in D'Iberville, Mississippi, across state lines to New Orleans, Louisiana.

18. On or about March 5, 2020, **THIBODEAUX** drove the 2019 white Ford F-250 pickup truck, bearing Vehicle Identification Number ending in [REDACTED], that he stole from the Ford dealership in D'Iberville, Mississippi, across state lines to New Orleans, Louisiana.

19. On or about March 5, 2020, **SYLVESTER** paid **BUSH** and **THIBODEAUX** approximately \$8,000 in cash for the two Ford F-250 pickup trucks stolen from the Ford dealership in D'Iberville, Mississippi.

20. On or about May 15, 2020, **BUSH** and **THIBODEAUX** traveled to Brandon, Mississippi to steal a 2015 gray Chevrolet Corvette Z06 Stingray and a 2019 Dodge Challenger R/T Scat Pack from the dealership.

21. Between in or about May 15, 2020 and August 19, 2020, **BUTLER** had multiple phone and text message conversations with a buyer (hereinafter "buyer C"), who purchased the 2015 gray Chevrolet Corvette Z06, wherein they discussed the acquisition, sale, and rebranding of stolen vehicles.

22. On or about May 16, 2020, **BUSH** stole the 2015 gray Chevrolet Corvette Z06 from the dealership in Mississippi and drove it across state lines back to the New Orleans metro area.

23. Between on or about May 16, 2020 and August 5, 2020, **THIBODEAUX** sold the stolen 2015 gray Chevrolet Corvette Z06 to buyer C in New Orleans.

24. Between on or about May 16, 2020 and August 5, 2020, **THIBODEAUX** split the proceeds of the sale of the stolen 2015 gray Chevrolet Corvette Z06 with **BUSH**.

25. On or about June 29, 2020, **BUSH** and **THIBODEAUX** stole a 2016 black Dodge Challenger Hellcat, bearing Vehicle Identification Number ending in [REDACTED], from a Chrysler dealership in Jackson, Alabama.

26. Between on or about June 29, 2020 and July 16, 2020, **BUTLER** replaced the VIN of the 2016 black Dodge Challenger Hellcat, bearing VIN ending in [REDACTED], that was previously stolen from a Chrysler dealership in Jackson, Alabama, with a fraudulent VIN ending in [REDACTED].

27. On August 21, 2020, the day law enforcement seized the stolen 2019 gray Chevrolet Suburban, **CHAPMAN** and **BUTLER** exchanged text messages discussing the seizure of a truck and the manner in which it was discovered by law enforcement.

28. On or about November 3, 2020, buyer C texted **BUTLER** a picture of a Ford black F-250, bearing Vehicle Identification Number ending in [REDACTED] that was stolen by **THIBODEAUX** from a Chevrolet dealership located in Berwick, Louisiana.

29. Between on or about May 22, 2020 and August 19, 2020, **BUTLER** drove a stolen 2020 white GMC Yukon Denali, bearing Vehicle Identification Number ending in [REDACTED] from Georgia to Louisiana for the purpose of delivering the GMC Yukon Denali to a buyer (hereinafter "buyer D") residing in Orleans Parish.

30. Between on or about May 22, 2020 and August 19, 2020, **BUTLER** paid **CHAPMAN** approximately \$8,000 for the 2020 white GMC Yukon Denali.

31. Between on or about May 22, 2020 and August 19, 2020, **BUTLER** sold the stolen 2020 white GMC Yukon Denali to buyer D for approximately \$10,500.

32. On or about August 21, 2020, buyer D sent **BUTLER** a text message containing a photograph of a warrant for the search and seizure of the 2020 white GMC Yukon Denali that he had previously purchased from **BUTLER**.

33. On or about August 21, 2020, **BUTLER** sent **CHAPMAN** a text message containing a photograph of the warrant for the search and seizure of the 2020 white GMC Yukon Denali, multiple photographs of the vehicle, and various messages discussing the potential methods that law enforcement employed to locate the vehicle.

34. On or about August 21, 2020, **BUTLER** and **CHAPMAN** exchanged text messages discussing the seizure of a stolen truck by law enforcement.

35. On or about August 25, 2020, **BUTLER** and **CHAPMAN** exchanged text messages wherein they discussed law enforcement's seizure of stolen vehicles from **SYLVESTER**.

36. On or about October 4, 2020, **SYLVESTER** and **THIBODEAUX** exchanged text messages containing a photograph of a 2017 Dodge Charger Hellcat stolen by **THIBODEAUX** and **BUSH** from a Buick GMC dealer located in New Roads, Louisiana.

37. On or about January 18, 2021, **CHAPMAN** sent **BUTLER** a text message stating that he made a connection with someone that could provide him with official car titles from the State of Georgia.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
(Sale and Receipt of a Stolen Motor Vehicle)

On or about March 5, 2020, in the Eastern District of Louisiana and elsewhere, the defendants, **JONATHAN BUSH a/k/a Joshua P. Martin**, **AARON THIBODEAUX**, and **TAWAUN A. SYLVESTER, a/k/a Polo, a/k/a T** did knowingly receive, possess, conceal, store,

barter, sell, and dispose of any motor vehicle, to wit: a silver 2020 Ford F-250 pickup truck bearing Vehicle Identification Number ending in [REDACTED], previously stolen from the State of Mississippi, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Sections 2313 and 2.

COUNT 3

(Sale and Receipt of a Stolen Motor Vehicle)

On or about March 5, 2020, in the Eastern District of Louisiana and elsewhere, the defendants, **AARON THIBODEAX, JONATHAN BUSH a/k/a Joshua P. Martin**, and **TAWAUN A. SYLVESTER, a/k/a Polo, a/k/a T** did receive, possess, conceal, store, barter, sell, and dispose of any motor vehicle, to wit: a 2019 white Ford F-250 pickup truck bearing Vehicle Identification Number ending in [REDACTED], previously stolen from the State of Mississippi, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Sections 2313 and 2.

COUNT 4

(Sale and Receipt of a Stolen Motor Vehicle)

On or about May 16, 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **JONATHAN BUSH a/k/a Joshua P. Martin**, did receive, possess, store, barter, sell, and dispose of any motor vehicle, to wit: a 2015 gray Chevrolet Corvette Z06 Stingray bearing Vehicle Identification Number ending in [REDACTED] previously stolen from the State of Mississippi, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Sections 2313 and 2.

COUNT 5

(Alter and remove motor vehicle identification numbers)

Between on or about August 2, 2019, and August 20, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **KEINAN NELSON CHAPMAN a/k/a Kado**, did

knowingly and unlawfully remove, obliterate, tamper with and alter the Vehicle Identification Number (“VIN”) from a motor vehicle, that is a 2019 gray Chevrolet Suburban having altered its VIN to read [REDACTED] in violation of Title 18, United States Code, Section 511.

COUNT 6

(Sale or Receipt of a Stolen Motor Vehicle)

On or about June 29, 2020, in the Eastern District of Louisiana and elsewhere, the defendants, **JONATHAN BUSH a/k/a Joshua P. Martin** and **AARON THIBODEAX**, did receive, possess, conceal, store, barter, sell, and dispose of any motor vehicle, to wit: a 2016 black Dodge Challenger Hellcat bearing Vehicle Identification Number ending in [REDACTED] previously stolen from the State of Alabama, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18 United States Code, Sections 2313 and 2.

COUNT 7

(Alter and remove motor vehicle identification numbers)

Between or about June 29, 2020 and July 16, 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **GREGORY BUTLER**, did knowingly and unlawfully remove, obliterate, tamper with and alter the vehicle identification number (VIN) for a motor vehicle, that is a 2016 black Dodge Challenger Hellcat, having altered its VIN to read [REDACTED] in violation of Title 18, United States Code, Section 511.

COUNT 8

(Sale and Receipt of a Stolen Motor Vehicle)

In or about May 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **GREGORY BUTLER**, did receive, possess, conceal, store, barter, sell, and dispose of any motor vehicle, to wit: a black Chevrolet Tahoe bearing Vehicle Identification Number ending in [REDACTED] previously stolen from the State of Louisiana, which had crossed a State or United States boundary

after being stolen, knowing same to have been stolen, in violation of Title 18, United States Code, Sections 2313 and 2.

COUNT 9

(Sale and Receipt of a Stolen Motor Vehicle)

In or about June 2019, in the Eastern District of Louisiana and elsewhere, the defendants, **GREGORY BUTLER** and **KEINAN NELSON CHAPMAN a/k/a Kado**, did receive, possess, conceal, store, barter, sell, and dispose of any motor vehicle, to wit: a 2018 blue Dodge Challenger RT392 bearing Vehicle Identification Number ending in [REDACTED], previously stolen from the State of Georgia, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Sections 2313 and 2.

COUNT 10

(Sale and Receipt of a Stolen Motor Vehicle)

Between on or about May 22, 2019 and August 19, 2020, in the Eastern District of Louisiana and elsewhere, the defendant, **GREGORY BUTLER**, did receive, possess, conceal, store, barter, sell, and dispose of any motor vehicle, to wit: a 2020 white GMC Yukon Denali bearing Vehicle Identification Number ending in [REDACTED], previously stolen from the State of Florida, which had crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Sections 2313 and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 10 of this Superseding Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1 through 10, the defendants, **KEINAN NELSON CHAPMAN a/k/a Kado**, **GREGORY BUTLER**, **TAWAUN A. SYLVESTER a/k/a Polo**, **a/k/a T**, **JONATHAN BUSH a/k/a Joshua P. Martin**, and **AARON THIBODEAUX**,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violations.


3. If any of the above-described property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendants up to the value of said property.

[REDACTED]

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New Orleans, Louisiana
December 10, 2021