

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

**SUPERSEDING INDICTMENT FOR CONSPIRACY TO COMMIT
OBSTRUCTION OF JUSTICE, MAKING FALSE STATEMENTS TO A
FEDERAL AGENT, INTERSTATE TRANSPORTATION, CONCEALMENT,
AND STORAGE OF A STOLEN MOTOR VEHICLE, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

*** CRIMINAL NUMBER: 10-261**

v.

*** SECTION: "K"**

SEAN HUNTER

*** VIOLATIONS: 18 U.S.C. § 2**

SHAUNA CROWDEN HUNTER

18 U.S.C. § 371

a/k/a Shauna Crowden

*** 18 U.S.C. § 1001**

a/k/a Shauna Hunter-Crowden

18 U.S.C. § 1503

a/k/a Shauna Desha Crowden

*** 18 U.S.C. § 2312**

18 U.S.C. § 2313

*** * ***

The Grand Jury charges that:

COUNT 1

**CONSPIRACY TO COMMIT OBSTRUCTION OF JUSTICE
AND MAKING FALSE STATEMENTS TO A FEDERAL AGENT**

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about February 15, 2005, the defendant, **SHAUNA CROWDEN HUNTER**, entered into a Lease Agreement with BMW Financial Services for the purchase of a new 2005 BMW 525i, Vehicle Identification Number WBANA53585B861734 (hereinafter BMW), with a retail value of \$53,377.27.

2. On or about March 7, 2005, the state of Louisiana issued Louisiana license plate NPT 591 for the BMW.

3. On or about August 8, 2005, defendant, **SHAUNA CROWDEN HUNTER**, contracted with Auto Club Inter-Insurance Exchange (AAA) to provide automotive insurance on the BMW.

4. On August 29, 2005, Hurricane Katrina made landfall with the Gulf Coast of Louisiana.

5. On or about September 27, 2005, defendant **SHAUNA CROWDEN HUNTER**, reported to the AAA insurance company that the BMW was completely destroyed during Hurricane Katrina and was last parked in front of her house at 12641 North Lake Carmel Drive in New Orleans, Louisiana.

6. On or about October 14, 2005, defendant **SHAUNA CROWDEN HUNTER**, completed and mailed a notarized Louisiana Power of Attorney, Bill of Sale, Proof of Loss Odometer Statement in which **SHAUNA CROWDEN HUNTER** claimed the BMW was a total loss, thereby transferring title of the BMW to AAA.

7. On or about November 8, 2005, AAA mailed Shauna Crowden check no. 80401854, in the amount of \$3,442.61, based on **SHAUNA CROWDEN HUNTER's** representations that her BMW was completely destroyed during Hurricane Katrina.

8. On or about November 11, 2005, AAA mailed BMW Financial Services check no. 80402657, in the amount of \$51,908.74, based on **SHAUNA CROWDEN HUNTER's** representations that her BMW was completely destroyed during Hurricane Katrina.

9. In June 2006, defendant, **SEAN HUNTER** was named Interim Director of Aviation for the Louis Armstrong International Airport (hereinafter the “Airport”) and was made the permanent Director of Aviation in June 2007.

10. On or about July 3, 2006, the defendants, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER**, were married in the U.S. Virgin Islands and lived together at 3735 Pin Oak Avenue in New Orleans, Louisiana.

11. On or about October 13, 2008, at approximately 7:04 p.m., a traffic camera took pictures of the BMW, Louisiana license plate NPT 591, running a red light at the intersection of South Carrollton Avenue and Palmetto Street in New Orleans.

12. On or about October 25, 2008, at approximately 2:33 p.m., a traffic camera took pictures of the BMW, Louisiana license plate NPT 591, running a red light at the intersection of St. Charles Avenue and Martin Luther King Jr. Blvd in New Orleans.

13. On or about October 27, 2008, at approximately 9:44 a.m., the BMW entered the short term parking garage at the Airport.

14. On or about April 9, 2009, law enforcement officers located the BMW hidden in a parking garage located at the Airport and the BMW odometer reflected approximately 29,900 miles.

15. On or about June 25, 2009, the Airport was served with a federal grand jury subpoena for certain records involving **SEAN HUNTER**'s BMW.

16. On or about September 16, 2009, **SEAN HUNTER** resigned from his position as Director of Aviation at the airport.

B. THE CONSPIRACY

Beginning at an unknown time but prior to July 2007, and continuing until the date of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, did knowingly and willfully combine, conspire, and agree together and with each other to:

1. obstruct justice; in violation of Title 18, United States Code, Section 1503;
and
2. make false statements to the Federal Bureau of Investigation; in violation of Title 18, United States Code, Section 1001;

in an effort to mislead investigators and to conceal, cover-up, and hide their continued use of the BMW from law enforcement and insurance officials.

C. OVERT ACTS

On or about the following dates, in the Eastern District of Louisiana and elsewhere, defendants, **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, committed the following overt acts, among others, in furtherance of the above described conspiracy:

1. On or about July 20, 2007, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER** purchased another luxury vehicle and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the true location of the BMW from insurance officials and law enforcement.

2. On or about July 20, 2007, **SEAN HUNTER** executed, under oath, a Louisiana Department of Public Safety and Corrections, Office of Motor Vehicles (LADPSC-OMV),

Vehicle Application, and provided a false address of 805 Vouray Drive, Kenner, Louisiana in an effort to conceal the true location of the BMW from insurance officials and law enforcement.

3. In or about October 2007, **SEAN HUNTER** caused to be mailed to the LADPSC-OMV, Baton Rouge, Louisiana, a vehicle registration application and a UCC Financing Statement that contained a false address of 805 Vouray Drive, Kenner, Louisiana.

4. On or about July 30, 2007, **SEAN HUNTER**, who was then the Director of Aviation for the Airport contacted a subordinate employee and instructed that employee to issue him a Vehicle Inspection Sticker for the BMW.

5. On or about July 30, 2007, a employee of the Airport issued to **SEAN HUNTER**, at the Airport's expense, a 2007 Kenner Vehicle Inspection Sticker No. 27115 for the BMW.

6. At a date unknown, but after on or about July 30, 2007, **SEAN HUNTER** and **SHAUNA CROWDEN HUNTER**, placed Kenner Vehicle Inspection Sticker No. 27115 on the BMW.

7. On or about October 1, 2007, **SHAUNA CROWDEN HUNTER** provided a false address of 12641 Polar Street, New Orleans, Louisiana to Peake BMW when she had the BMW serviced.

8. In May or June 2008, **SEAN HUNTER**, in his capacity as Director of Aviation for the Airport, instructed the General Manager in charge of the parking garage at the Airport not to remove or tow his black BMW with license plate NPT 591 from the garage.

9. On or about October 27, 2008, at approximately 9:44 a.m., **SHAUNA CROWDEN HUNTER** and **SEAN HUNTER**, parked the BMW at the Airport short term parking garage in an effort to hide the BMW.

10. On or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said she no longer lived in New Orleans, she moved to Washington, D. C., and she provided him with a false address.

11. On or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said the BMW was located in an impound yard in Kenner, Louisiana.

12. On or about June 2, 2009, **SEAN HUNTER** contacted an investigator with AAA and asked the investigator if there was a way to keep his wife from going to jail.

13. On or about October 16, 2009, **SEAN HUNTER** contacted an individual who **SEAN HUNTER** knew was a witness in the federal criminal investigation into himself and his wife and **SEAN HUNTER** endeavored to obstruct justice by seeking to influence the witness's testimony.

14. On or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation when he said he had registered his other luxury vehicle, the Land Rover LR3, at his Pin Oak address.

15. On or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation when he said he had registered his other luxury vehicle, the Land Rover LR3, at a post office box at the airport.

16. On or about January 14, 2010, **SEAN HUNTER** lied to a special agent with the Federal Bureau of Investigation when he said he requested a brake tag from the airport for his other luxury vehicle, the Land Rover LR3, and not for the BMW, when in fact **HUNTER** had requested and placed the brake tag on the BMW.

17. On or about March 31, 2010, **SHAUNA CROWDEN HUNTER** lied to a special agent with the Federal Bureau of Investigation when she claimed she drove the BMW after parking the BMW at the airport on October 27, 2008.

18. On or about March 31, 2010, **SHAUNA CROWDEN HUNTER** lied to a special agent with the Federal Bureau of Investigation when she claimed she had received a moving violation while driving the BMW in Jefferson Parish after parking the BMW at the airport on October 27, 2008.

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

COUNT 2

INTERSTATE TRANSPORTATION OF A STOLEN MOTOR VEHICLE

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. In or about November 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **SHAUNA CROWDEN HUNTER**, did unlawfully transport in interstate commerce a stolen motor vehicle, belonging to AAA, that is, a BMW 525i, Vehicle Identification Number WBANA53585B861734, from Louisiana to Texas, knowing the same to be stolen; all in violation of Title 18, United States Code, Section 2312.

COUNT 3

INTERSTATE TRANSPORTATION OF A STOLEN MOTOR VEHICLE

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. After on or about November 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **SHAUNA CROWDEN HUNTER**, did unlawfully transport in interstate commerce a stolen motor vehicle, belonging AAA, that is, a BMW 525i, Vehicle Identification Number WBANA53585B861734, from Texas to Louisiana, knowing the same to be stolen, all in violation of Title 18, United States Code, Section 2312.

COUNT 4

CONCEALMENT AND STORAGE OF A STOLEN MOTOR VEHICLE

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about October 27, 2008, in the Eastern District of Louisiana, the defendant, **SEAN HUNTER**, did receive, possess, conceal, store, barter, sell and dispose of a stolen motor vehicle, that is a BMW 525i, Vehicle Identification Number WBANA53585B861734, which vehicle had crossed a State boundary after being stolen, to wit, said vehicle being stolen on or about October 14, 2005, in New Orleans, Louisiana and subsequently brought into the State of Texas and then back to Louisiana; all in violation of Title 18, United States Code, Section 2313.

COUNT 5

OBSTRUCTION OF JUSTICE

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning in or around October 2009, and continuing to the date of this Indictment, in the Eastern District of Louisiana, the defendant, **SEAN HUNTER**, did corruptly endeavor to influence, obstruct, and impede the due administration of justice, before the Federal Grand Jury

for the Eastern District of Louisiana, in that **SEAN HUNTER**, in an effort to mislead investigators and to conceal, cover-up, and hide from law enforcement and insurance officials defendants' continued use of the BMW contacted C. B., a witness known to **SEAN HUNTER**, and initiated a conversation into the federal investigation of **SEAN HUNTER**, and at that time, **SEAN HUNTER** conveyed to C. B. that he had given C. B. a check for the rental of an apartment on Vouray Drive, when in truth and fact, no such arrangement had taken place; all in violation of Title 18, United States Code, Sections 1503 and 2.

COUNT 6

MAKING FALSE STATEMENTS TO FEDERAL AGENTS

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about January 14, 2010, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **SEAN HUNTER**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, in an effort to mislead investigators and to conceal, cover-up, and hide from law enforcement and insurance officials defendants' continued use of the BMW, lied to a Special Agent with the FBI when the defendant said he had obtained a brake tag from the airport for another luxury automobile, specifically a Land Rover LR3, when in truth and fact, **SEAN HUNTER** had actually obtained the brake tag for the BMW; all in violation of Title 18, United States Code, Sections 1001 and 2.

COUNT 7

MAKING FALSE STATEMENTS TO FEDERAL AGENTS

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about January 14, 2010, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **SEAN HUNTER**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, in an effort to mislead investigators and to conceal, cover-up, and hide from law enforcement and insurance officials defendants' continued use of the BMW, lied to a Special Agent with the FBI when the defendant said he had registered another luxury automobile, specifically a Land Rover LR3, at his home on Pin Oak and then **SEAN HUNTER** told the FBI that he had registered the LR3 at an airport post office box, when in truth and fact, **SEAN HUNTER** actually registered the Land Rover LR3 at an address on Vouray Drive in Kenner, Louisiana; all in violation of Title 18, United States Code, Sections 1001 and 2.

COUNT 8

MAKING FALSE STATEMENTS TO FEDERAL AGENTS

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about January 14, 2010, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **SEAN HUNTER**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, in an effort to mislead investigators

and to conceal, cover-up, and hide from law enforcement and insurance officials defendants' continued use of the BMW, lied to a Special Agent with the FBI when the defendant said he had used a mailbox key provided to him by C. B. to check mail at the Vouray Drive address, when in truth and fact, C. B. had never given **SEAN HUNTER** a mailbox key to C. B.'s apartment located on Vouray Drive in Kenner, Louisiana; all in violation of Title 18, United States Code, Sections 1001 and 2.

COUNT 9

MAKING FALSE STATEMENTS TO FEDERAL AGENTS

A. The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. On or about March 31, 2010, in the Eastern District of Louisiana, in a matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States, the defendant, **SHAUNA CROWDEN HUNTER**, did knowingly and willfully make a false, fraudulent, and fictitious material statement and representation; that is the defendant, in an effort to mislead investigators and to conceal, cover-up, and hide from law enforcement and insurance officials defendants' continued use of the BMW, lied to a Special Agent with the FBI when the defendant said she drove the BMW after parking the car at the airport on October 27, 2008, and **SHAUNA CROWDEN HUNTER** claimed she received a moving violation in Jefferson Parish while driving the BMW after October 27, 2008, when in truth and fact, she did not remove the BMW from the airport garage nor did she receive a moving violation in Jefferson Parish after October 27, 2008; all in violation of Title 18, United States Code, Sections 1001 and 2.

**NOTICE OF INTERSTATE TRANSPORTATION OF
A STOLEN MOTOR VEHICLE FORFEITURE**

1. The allegations of Counts 2 and 3 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982(a)(5)(D).

2. As a result of the offenses, alleged in Counts 2 and 3, defendant, **SHAUNA CROWDEN HUNTER**, shall forfeit to the United States any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, to a violation of Title 18, United States Code, Section 2312.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- 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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

NOTICE OF OBSTRUCTION OF JUSTICE FORFEITURE

1. The allegations of Count 4 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1503 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 4, defendant, **SEAN HUNTER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1503.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1503 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

Foreperson

JIM LETTEN (8517)
United States Attorney

JAN MASELLI MANN (9020)
First Assistant United States Attorney
Chief, Criminal Division

SALVADOR PERRICONE (10515)
Assistant United States Attorney
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JAMES R. MANN (20513)
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MATTHEW S. CHESTER
Assistant United States Attorney

New Orleans, Louisiana
September 17, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

SEP 13 2010

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

VS.

SHAUNA CROWDEN HUNTER
a/k/a Shauna Crowden
a/k/a Shauna Hunter-Crowden
a/k/a Shauna Desha Crowden

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CRIMINAL NO. H-10-

H-10-621

INDICTMENT

The United States Grand Jury charges:

COUNT 1

(Mail Fraud - 18 U.S.C. § 1341)

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about February 15, 2005, the defendant,

SHAUNA CROWDEN HUNTER

entered into a Lease Agreement with BMW Financial Services for the purchase of a new 2005 BMW 525i, Vehicle Identification Number WBANA53585B861734 (hereinafter BMW), with a retail value of \$53,377.27.

2. On or about March 7, 2005, the state of Louisiana issued Louisiana license plate NPT 591 for the BMW.

3. On or about August 8, 2005, defendant, **SHAUNA CROWDEN HUNTER**, contracted with Auto Club Inter-Insurance Exchange (AAA) to provide automotive insurance on the BMW.

4. On or about August 28, 2005, **SHAUNA CROWDEN HUNTER** traveled to Houston,

Texas and lived in Houston for approximately 5-6 months.

5. On August 29, 2005, Hurricane Katrina made landfall with the Gulf Coast of Louisiana.

6. On or about September 27, 2005, defendant **SHAUNA CROWDEN HUNTER**, reported to the AAA insurance company that the BMW was completely destroyed during Hurricane Katrina and was last parked in front of her house at 12641 North Lake Carmel Drive in New Orleans, Louisiana.

7. On or about November 8, 2005, the AAA insurance company mailed Shauna Crowden check no. 80401854, in the amount of \$3,442.61, based on **SHAUNA CROWDEN HUNTER's** representations that her BMW was completely destroyed during Hurricane Katrina.

8. On or about November 11, 2005, the AAA insurance company mailed BMW Financial Services check no. 80402657, in the amount of \$51,908.74, based on **SHAUNA CROWDEN HUNTER's** representations that her BMW was completely destroyed during Hurricane Katrina.

9. On or about October 13, 2008, at approximately 7:04 p.m., a traffic camera took pictures of the BMW, Louisiana license plate NPT 591, running a red light at the intersection of South Carrollton Avenue and Palmetto Street in New Orleans, Louisiana.

10. On or about October 25, 2008, at approximately 2:33 p.m., a traffic camera took pictures of the BMW, Louisiana license plate NPT 591, running a red light at the intersection of St. Charles Avenue and Martin Luther King Jr. Blvd in New Orleans, Louisiana.

11. On or about October 27, 2008, at approximately 9:44 a.m., the BMW entered the short term parking garage at the Louis Armstrong International Airport (hereinafter the "Airport") located in Kenner, Louisiana.

12. On or about April 9, 2009, law enforcement officers located the BMW hidden in a parking garage located at the Airport and the BMW odometer reflected approximately 29,900 miles.

MAIL FRAUD

B. THE SCHEME TO DEFRAUD

Beginning on or about September 5, 2005, and continuing to the date of this indictment, in the Southern District of Texas and elsewhere,

SHAUNA CROWDEN HUNTER

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and/or property to wit: money and the use of a 2005 BMW 525i luxury sedan, with a value of approximately \$53,000.00, that belonged to AAA, by means of false pretenses, promises and representations thereby defrauding the AAA insurance company of its money and/or property.

It was a part of the scheme and artifice to defraud that **SHAUNA CROWDEN HUNTER** and others known to the grand jury colluded together and made multiple misrepresentations to the AAA insurance company, and others, to conceal, cover-up, and hide their continued use of the BMW, thereby defrauding AAA of their residual value and equity in the fraudulently obtained BMW.

It was further a part of the scheme and artifice to defraud that on or about September 5, 2005, **SHAUNA CROWDEN HUNTER** contacted the AAA insurance company to initiate a claim with respect to her BMW.

It was further a part of the scheme and artifice to defraud that on or about September 27,

2005, **SHAUNA CROWDEN HUNTER** told AAA that her BMW was completely submerged and was a total loss.

It was further a part of the scheme and artifice to defraud that **SHAUNA CROWDEN HUNTER** continued to exercise control over the BMW.

It was further a part of the scheme and artifice to defraud that on or about October 14, 2005, **SHAUNA CROWDEN HUNTER** falsely completed and mailed a notarized Odometer Statement with respect to the BMW, thereby transferring title of the BMW to AAA.

It was further a part of the scheme and artifice to defraud that on or about December 14, 2005, **SHAUNA CROWDEN HUNTER** falsely stated to AAA that her BMW was located in front of her residence at 12641 North Lake Carmel Drive, New Orleans, Louisiana.

It was further a part of the scheme and artifice to defraud that on or about January 5, 2006, **SHAUNA CROWDEN HUNTER** falsely stated to AAA that she had last seen her BMW prior to Hurricane Katrina at 12641 North Lake Carmel Drive and that she had no idea of the current location of the BMW.

It was further a part of the scheme and artifice to defraud that on or about October 27, 2008, at approximately 9:44 a.m., **SHAUNA CROWDEN HUNTER** and an individual known to the grand jury, parked the BMW at the Airport short term parking garage in an effort to conceal the scheme to defraud.

It was further a part of the scheme and artifice to defraud that on or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said she no longer lived in New Orleans, that she moved to Washington, D. C., and she provided a false address.

It was further a part of the scheme and artifice to defraud that on or about January 22, 2009, **SHAUNA CROWDEN HUNTER** lied to an investigator with AAA when she said the BMW was located in a tow yard in Kenner, Louisiana.

C. THE MAILING (ODOMETER STATEMENT)

On or about October 14, 2005, in the Southern District of Texas and elsewhere, the defendant, **SHAUNA CROWDEN HUNTER**, for the purpose of executing the scheme and artifice to defraud set forth in Part B, knowingly and willfully caused to be delivered by mail, according to the direction thereon, a notarized Louisiana Power of Attorney, Bill of Sale, Proof of Loss Odometer Statement dated October 14, 2005, that **SHAUNA CROWDEN HUNTER** falsely completed and signed; all in violation of Title 18, United States Code, Section 1341.

COUNT 2

(Mail Fraud - 18 U.S.C. § 1341)

A. The allegations contained in Parts A and B of Count 1 are hereby re-alleged and incorporated herein by reference.

B. THE MAILING (AAA CHECK)

On or about November 8, 2005, in the Southern District of Texas and elsewhere, the defendant, **SHAUNA CROWDEN HUNTER**, for the purpose of executing the scheme and artifice to defraud set forth in Part B of Count 1, knowingly and willfully caused to be delivered by mail, according to the direction thereon, AAA, check No. 80401854, in the amount of \$3,442.61, payable to Shauna Crowden; all in violation of Title 18, United States Code, Section 1341.

NOTICE OF MAIL FRAUD FORFEITURE

1. The allegations of Counts 1 and 2 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 1 and 2, defendant,

SHAUNA CROWDEN HUNTER

shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1341.

3. If any of the property subject to forfeiture, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1341 and 981(a)(1)(C), made

applicable through Title 28, United States Code, Section 2461(c).

ATRIE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO
United States Attorney

By: *Douglas Davis*
Douglas Davis
Assistant United States Attorney
Southern District of Texas

Brian M. Klebba
Brian M. Klebba
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Eastern District of Louisiana