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## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

*April 05, 2024*

Nathan Ochsner, Clerk of Court

United States of America  
v.  
Kenneth Dwayne Westbrook

Case No. **4:24-mj-0144**

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see below in the county of Harris and elsewhere in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1343 and 2

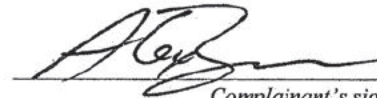
*Offense Description*

On or about December 11, 2023, within the Southern District of Texas and elsewhere, the defendant, Kenneth Dwayne Westbrook, devised and intended to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and on that date and place, for the purpose of executing that scheme caused to be transmitted by means of wire communication in interstate commerce signals and sounds, all in violation of 18 U.S.C. § 1343 and 2.

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.



*Complainant's signature*

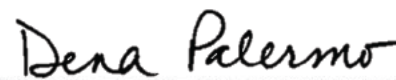
FBI Special Agent Alexander Rayas

*Printed name and title*

Attested to by the applicant in accordance with  
the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: April 05, 2024

City and state: Houston, Texas



*Judge's signature*

US Magistrate Judge Dena Palermo

*Printed name and title*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

KENNETH DWAYNE WESTBROOK

Case No. **4:24-mj-0144**

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Alexander Rayas, being first duly sworn, hereby depose and state as follows:

**SUMMARY**

The Federal Bureau of Investigation is investigating Kenneth Dwayne Westbrook who stole vehicles from Turo, a car rental service, thus violating 18 U.S.C. §§ 1343 (wire fraud) and 2 (aiding and abetting) (collectively, the "Subject Offenses"). According to the evidence, Westbrook used Instagram accounts to recruit people who he then directed to rent vehicles from Turo, and deliver those vehicles to him. Then, instead of returning the vehicles when the rental period expired, Westbrook stole them and apparently sold them to buyers in Mexico. The renters recruited by Westbrook provided copies of their iMessages and SMS messages to the FBI. The FBI now seeks an arrest warrant.

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since November 18, 2016. I am currently assigned to the Money Laundering and Financial Institution Fraud Squad in the Houston Division. I hold a Bachelor of Science degree in business with a concentration in computer information systems. During my undergraduate studies, I completed coursework in both accounting and finance. I also hold a master's degree in business administration. From 2010 until 2016, I worked for the U.S. Department of the Treasury's

Internal Revenue Service ("IRS"). During part of that time, I served as a tax examiner verifying certain tax filings and requiring documentation as to filers' claims. While with the IRS, I served as an information technology specialist managing and troubleshooting technical issues. As part of my current duties with the FBI, I investigate violations of federal law, including fraud-related activity in connection with money laundering and other financial crimes. I gained experience in the conduct of such investigations through extensive training and work related to these types of criminal investigations. For instance, I have written affidavits and served as an affiant for email search warrants connected with financial investigations, analyzed the records derived from returns on subpoenas served on financial institutions, conducted surveillance for financial crime investigations, and analyzed financial documents and communications in connection with financial investigations. Additionally, I have attended training conferences hosted by the FBI related to complex financial crimes and money laundering. I am also fluent in the Spanish language.

2. I am an "investigative or law enforcement officer" within the meaning of 18 U.S.C. § 2510; that is, an officer of the United States of America who is empowered to investigate and make arrests for the Subject Offenses.

3. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter. The facts set forth in this Affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary for the limited purpose of establishing probable cause. Additionally, unless otherwise indicated, wherever in this Affidavit I assert that an individual



made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement. The following is true to the best of my knowledge and belief.

### **PROBABLE CAUSE**

#### **THE FBI IS INVESTIGATING WESTBROOK FOR CONSPIRING TO STEAL VEHICLES**

4. FBI Houston Division is investigating Kenneth Dwayne Westbrook (a.k.a. “Bossmann Boosie” or “Boosie” and other similar variations) for conspiring to steal vehicles using an online platform named Turo.

5. According to representatives from Turo, Turo is a car sharing marketplace where vehicle owners can list their vehicles online on the Turo website or via the Turo app. Individuals search Turo for vehicles, select a vehicle for a specific time frame, and pick it up from the owner.

6. Turo’s investigation revealed Westbrook was the primary subject in at least 25 stolen Turo vehicle reports in Houston. Law enforcement was also notified and involved in each report of a stolen Turo vehicle. If Turo or law enforcement was not able to recover the stolen Turo vehicles within 30 days of the investigation, Turo paid the vehicle owner the value of the stolen vehicle. Turo’s total financial loss paid to the owners since September 2022 is over \$1,500,000.

#### **HOW WESTBROOK’S SCHEME WORKED, GENERALLY**

7. According to Turo, from September 2022 to present, Westbrook used Instagram to post videos and photos seeking Turo account holders in the Houston area to reserve vehicles on Westbrook’s behalf in exchange for money. The individuals who used Turo to rent vehicles on Westbrook’s behalf are referred to here as “renters.” Typically, Westbrook promised to pay

\$2,500 to \$5,000 to renters who reserved Turo vehicles that Westbrook could use. This was far more than the cost of the Turo reservation. Westbrook used these renters as a buffer so that he could gain access to Turo vehicles while minimizing the chance that he would be linked to those vehicles.

8. According to the renters—and the messages they provided—Westbrook told the renters which Turo vehicle to reserve. When the renters picked up the Turo vehicle, Westbrook instructed them to deliver the vehicle to a certain location and leave the keys for him. The renters were apparently paid at least part of the money via CashApp or cash by Westbrook and/or Westbrook's associates.

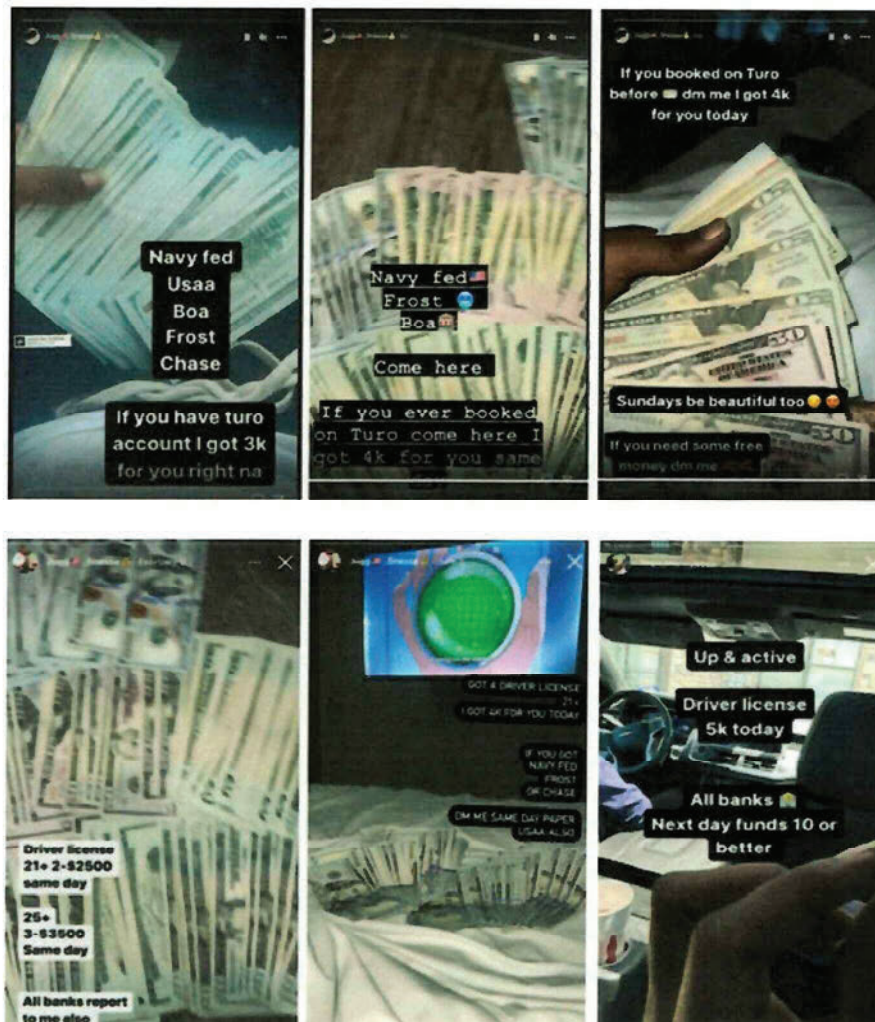
9. When the Turo reservation was about to expire, some renters attempted to convince Westbrook to return the Turo vehicle. However, according to witness statements, Turo's investigation, and law enforcement reports, Westbrook often stalled the return of the Turo vehicle to the renter and/or the vehicle owner to buy time to get the Turo vehicle across the border with Mexico. Sometimes, Westbrook provided renters a fabricated story to tell Turo, the vehicle owner, and law enforcement of the vehicle being stolen from the renter's possession.

10. Several Turo vehicles' Global Positioning Systems (GPS) tracked the stolen Turo vehicles at, near or crossing the Mexico border. According to Turo, several Turo vehicles attributed to Westbrook that were reported stolen were later recovered in Mexico.

11. The FBI has spoken to the witnesses listed below and corroborated their information. At this stage, the FBI merely lists them as witnesses to protect their identities from retaliation by Westbrook.

## EXAMPLES OF HOW WESTBROOK SOLICITED TURO ACCOUNT HOLDERS

12. Below are screenshots from his "bossmann\_boosie" Instagram profile from Westbrook's saved Instagram stories that are open to the public on his profile and are located in public-viewing folders entitled, "Jugg..finesse" and "Trips,money&hos." As shown in the screenshots below observed by the FBI, Westbrook posts these Instagram stories on his public profile to elicit individuals with Turo accounts and driver's licenses to contact him to get compensated \$2,500 to \$5,000.

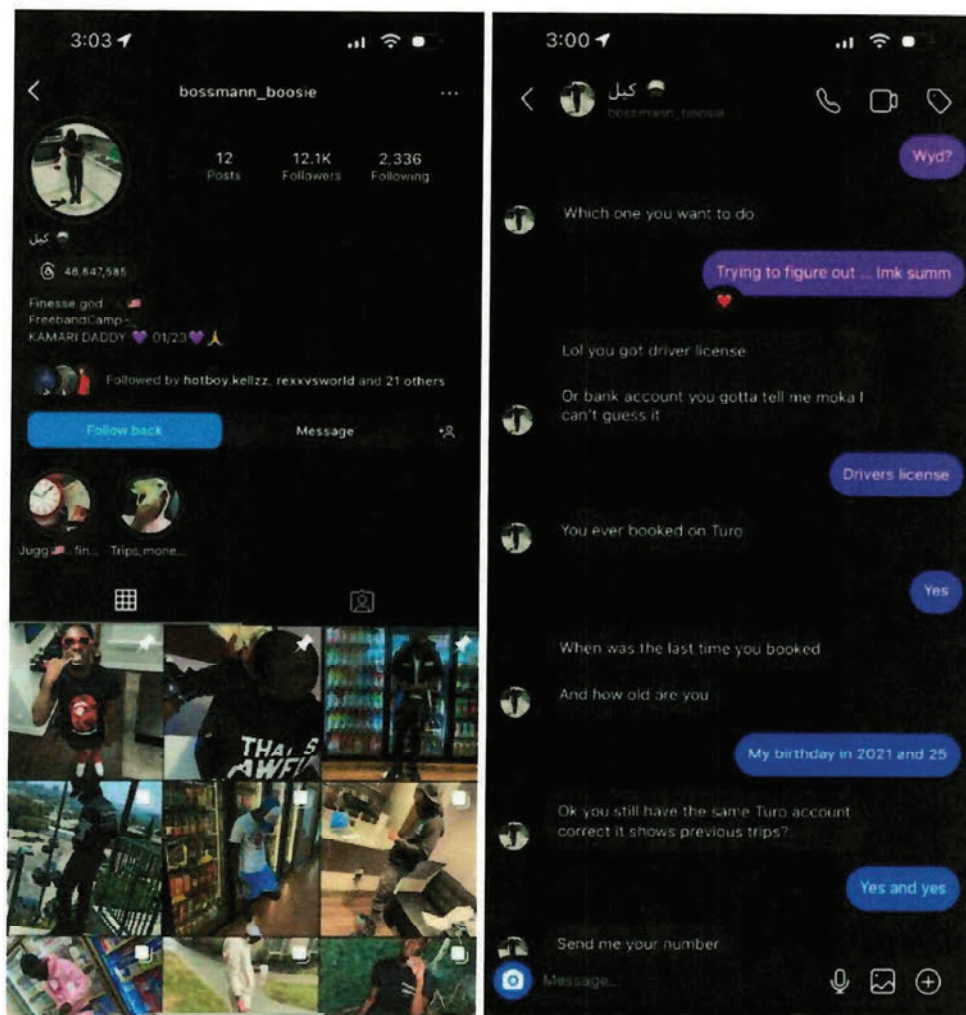




**AT WESTBROOK'S DIRECTION, WITNESS #1 RENTED A JEEP WRANGLER ON TURO, TURNED IT OVER TO HIM, AND HE STOLE IT**

13. Witness #1 spoke with the FBI and provided the following information.

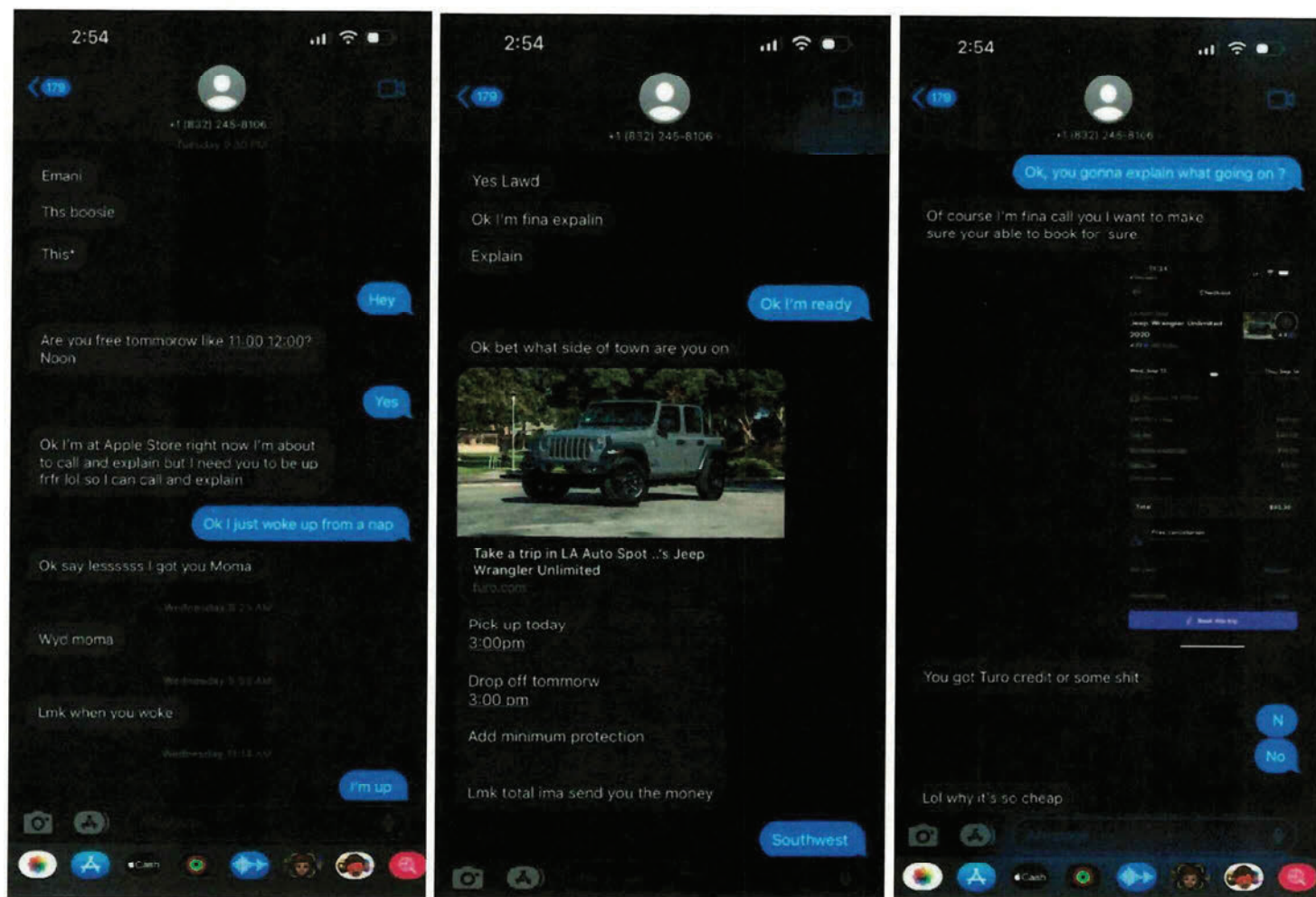
According to Witness #1, she responded to a solicitation on the Instagram bossmann\_boossie account. Westbrook messaged her back, asking if she had a driver's license or a bank account—and whether she had ever booked on Turo before. Notably, once Westbrook confirmed that Witness #1 seemed suitable, he asked for her phone number, moved the conversation off Instagram, and proceeded to directly exchange iMessages. A screenshot of their Instagram messages provided by Witness #1 is below.



14. Now communicating via iMessage, Westbrook sent Witness #1 a link to a Jeep Wrangler Unlimited listed on Turo. According to Witness #1, Westbrook asked her to book this vehicle and in exchange offered to pay \$300 ahead of time and an additional \$500 afterwards.

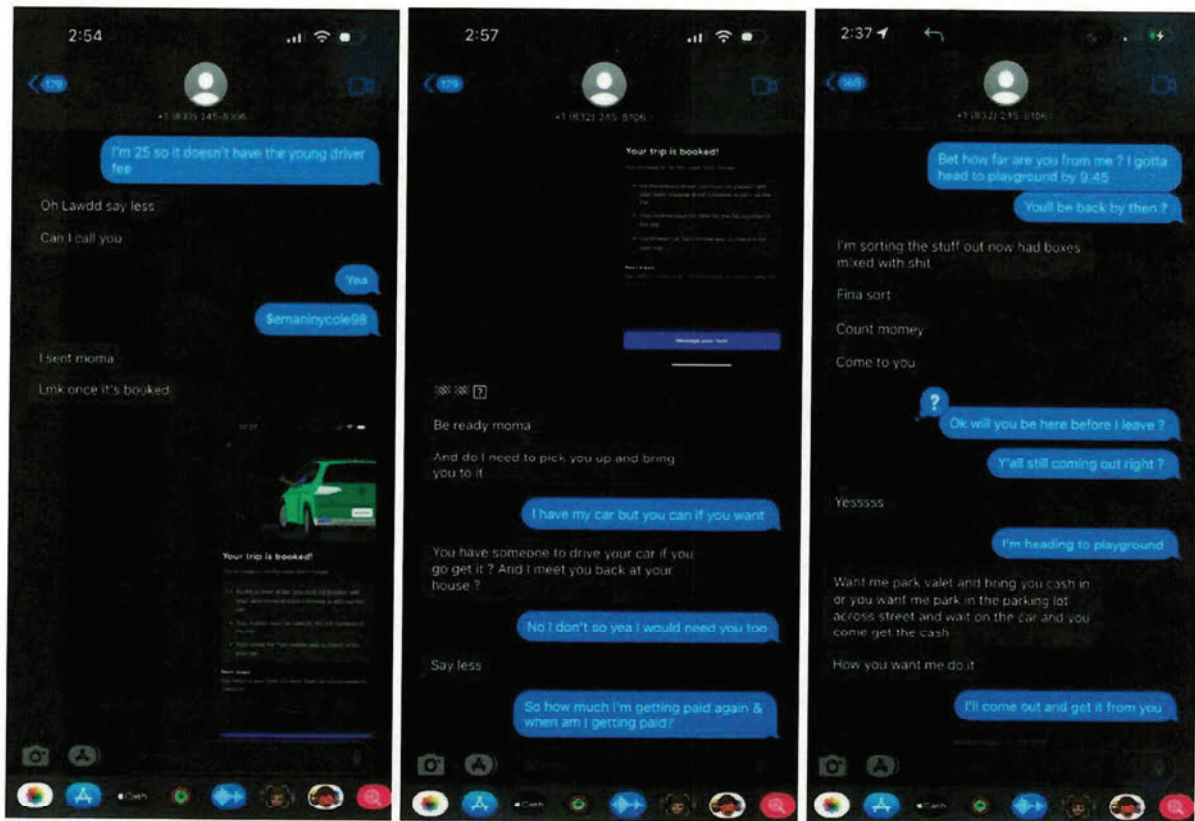
15. To corroborate this, Witness #1 provided screenshots of the messages (reproduced below) that Westbrook sent. As these messages show, Westbrook told Witness #1 where to meet him to deliver the vehicle. According to Turo's records, around September 13, 2023, Witness #1 picked up a 2020 Gray Jeep Wrangler Unlimited.

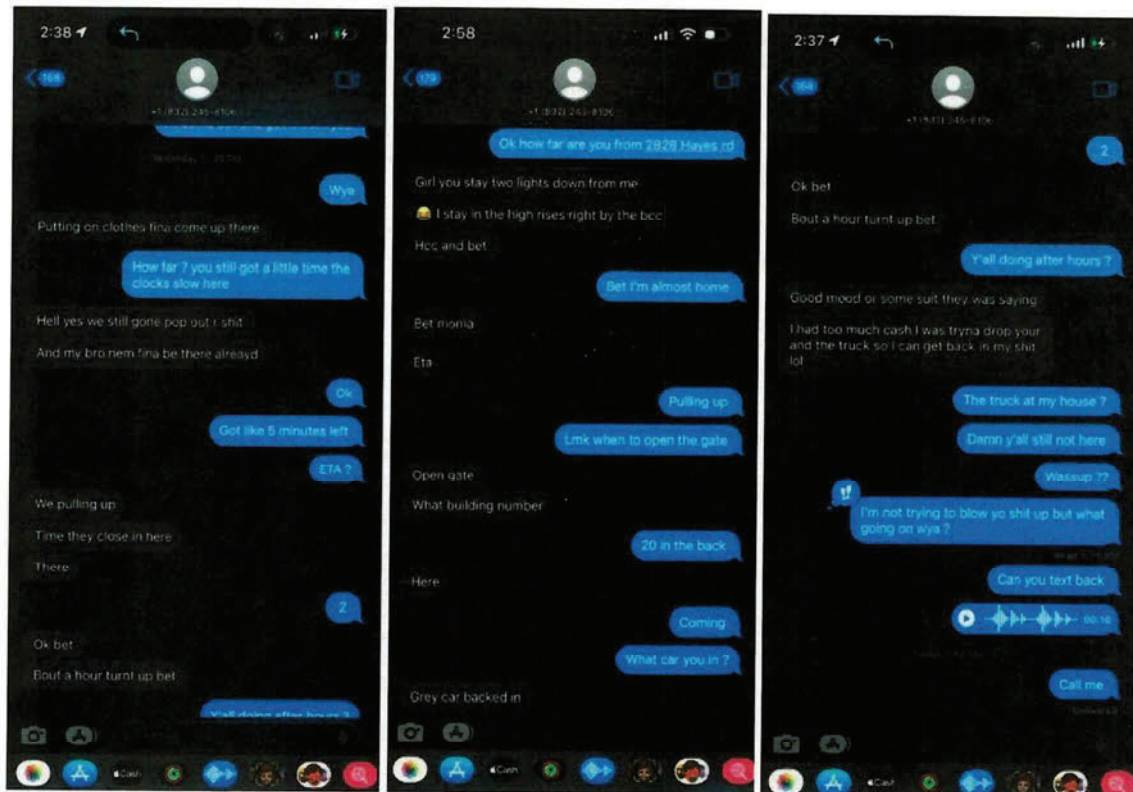
16. The rental period ended the next day on September 14, 2023, but according to Witness #1, Westbrook did not return the vehicle. According to Turo's GPS records, around





September 14, 2023 near 3 am, the vehicle crossed from Eagle Pass, Texas into Mexico and has since not been recovered. According to the messages that Westbrook sent, Westbrook stopped responding to Witness #1.

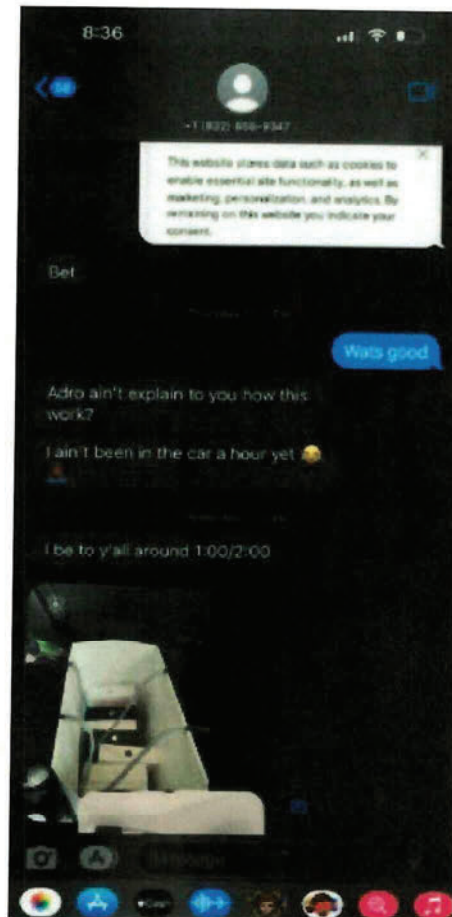
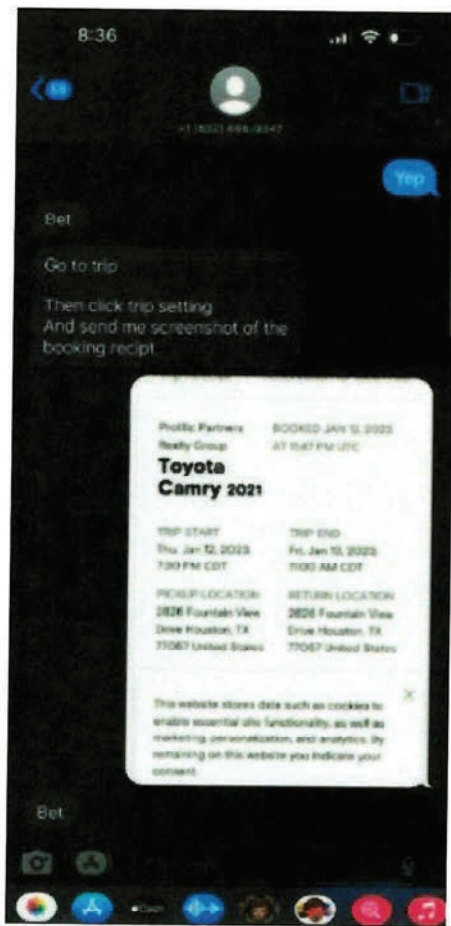




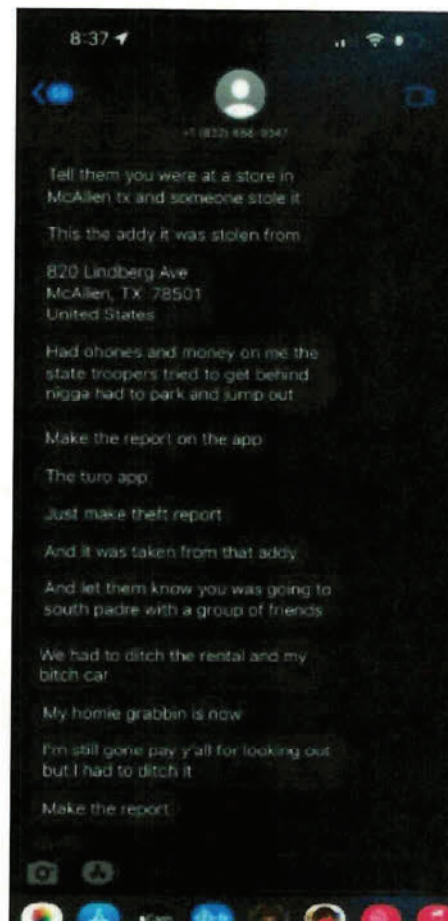
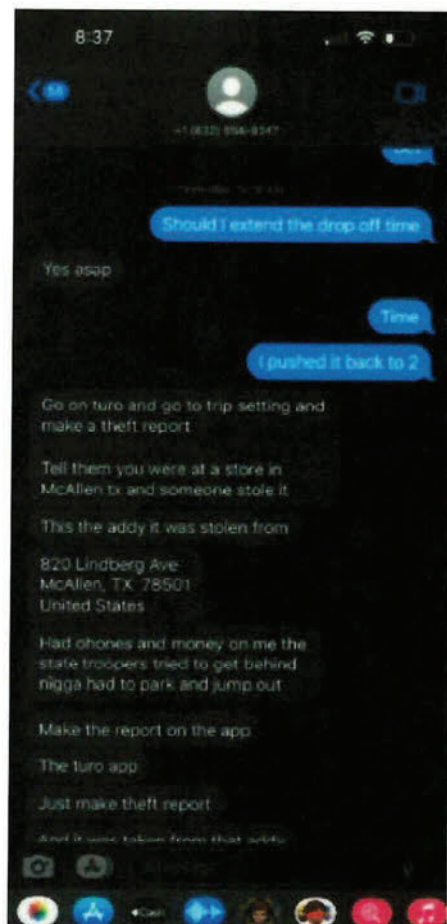
**INSTEAD OF RETURNING THE VEHICLE, WESTBROOK INSTRUCTS WITNESS #5 TO REPORT THE TURO VEHICLE AS BEING STOLEN**

17. Below are screenshots of an iMessage exchange provided by Witness #5 to a Turo investigator which show Witness #5 exchanging iMessages with phone number 832-658-9347. This phone number belongs to Westbrook according to Witness #2, Witness #4, Witness #5, and information Affiant observed in Houston Police Department Investigation #119610522. In the screenshot, Westbrook requests Witness #5 to report the Turo vehicle stolen. Westbrook requested Witness #5 send Westbrook a screenshot of the Turo booking receipt to verify the Turo vehicle reservation. Witness #5 then picked up the Turo vehicle and transferred the Turo vehicle into Westbrook's possession. When the Turo vehicle reservation was nearly expired, Witness #5 asked Westbrook if Witness #5 should extend the Turo reservation. Westbrook tells

Witness #5 to report the Turo vehicle stolen and gives Witness #5 a fabricated story to tell law enforcement and Turo.





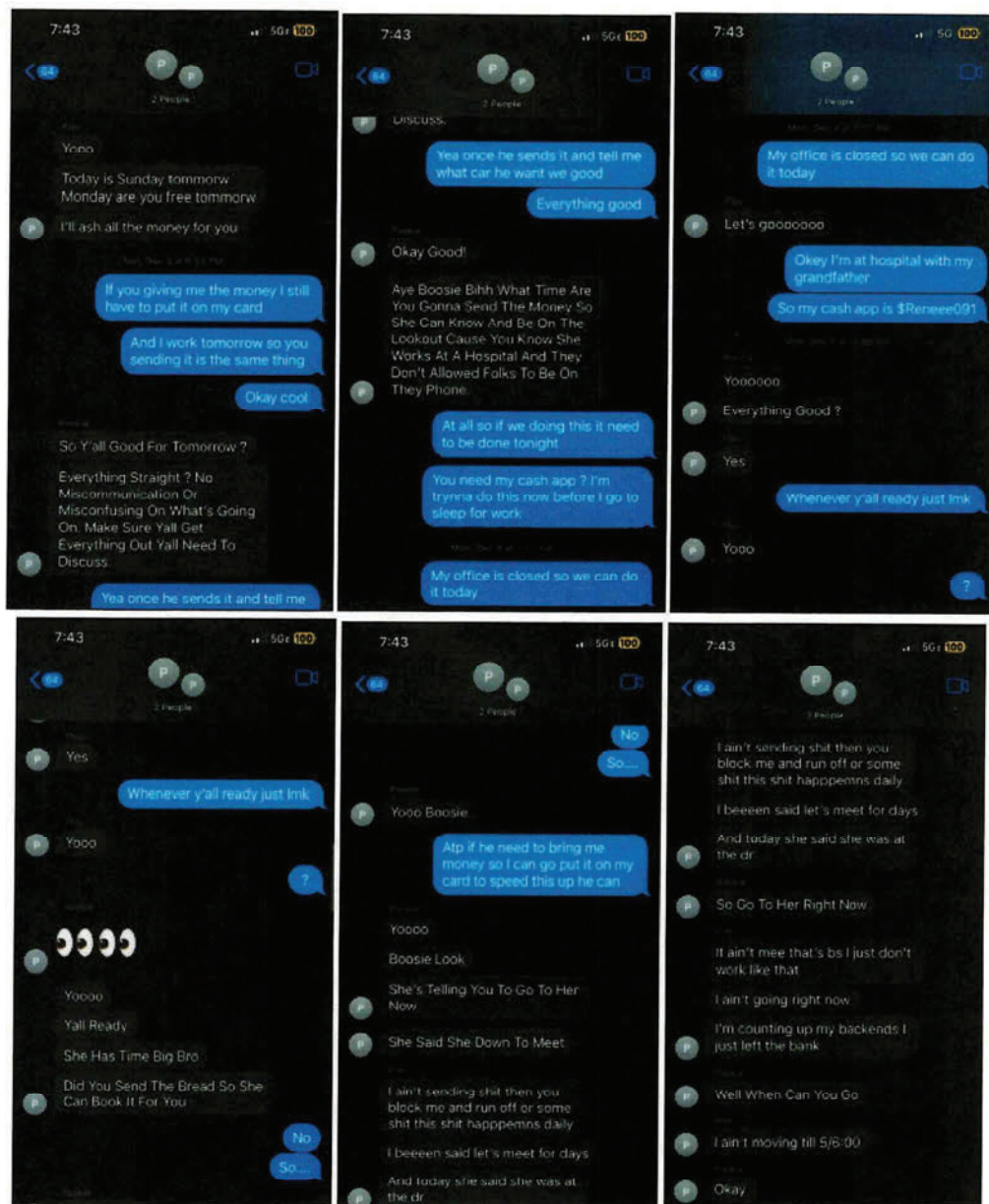


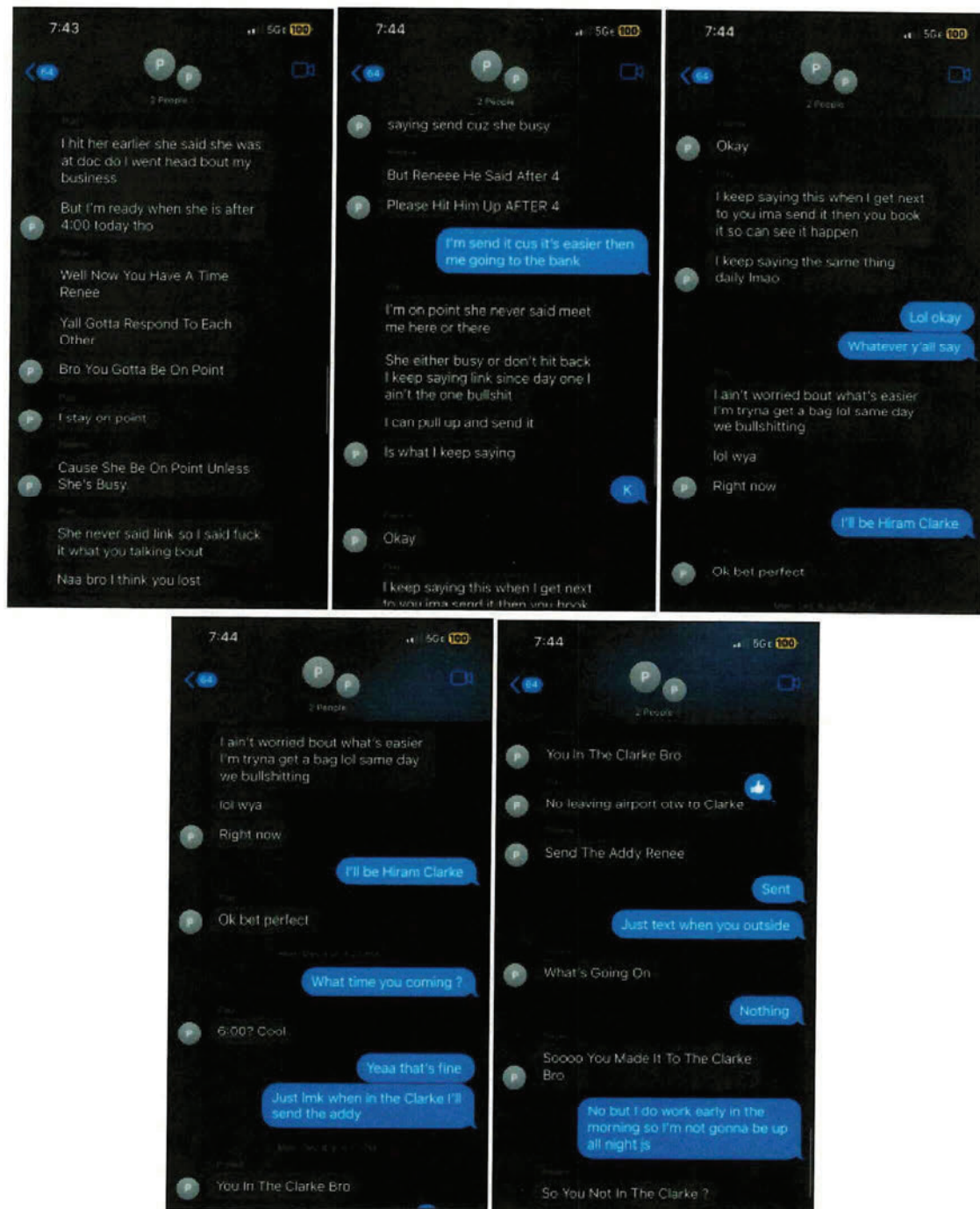
**WESTBROOK CAN BE IDENTIFIED BY AT LEAST ONE  
COOPERATING STRAW RENTER**

18. Witness #27 was identified by Turo and interviewed by the Houston Police Department (HPD) on or about December 18, 2023, as part of HPD Case #1795633-23.
19. This HPD investigation was initiated after a 2018 White Dodge Ram 1500 was reported stolen by its owner after the vehicle was rented by Witness #27 on Turo.
20. Witness #27 was interviewed by HPD and provided the following information:
21. She was introduced to Westbrook by her ex-boyfriend. Her ex-boyfriend starts a text message group between the he, Westbrook and the Witness. The Witness shared screenshots

of this conversation and they are provided below. Here, Westbrook is seen texting from phone number 346-313-9647.

22. During that conversation, Westbrook inquires about Witness #27's availability over the coming days and they discuss how Westbrook will send her money for renting a vehicle for him on Turo. Notably, the ex-boyfriend is vouching for Witness #27's reliability during this conversation.





23. The conversation between Westbrook and Witness #27 then carries over to their own private message thread. Screenshots of this conversation are also provided below.

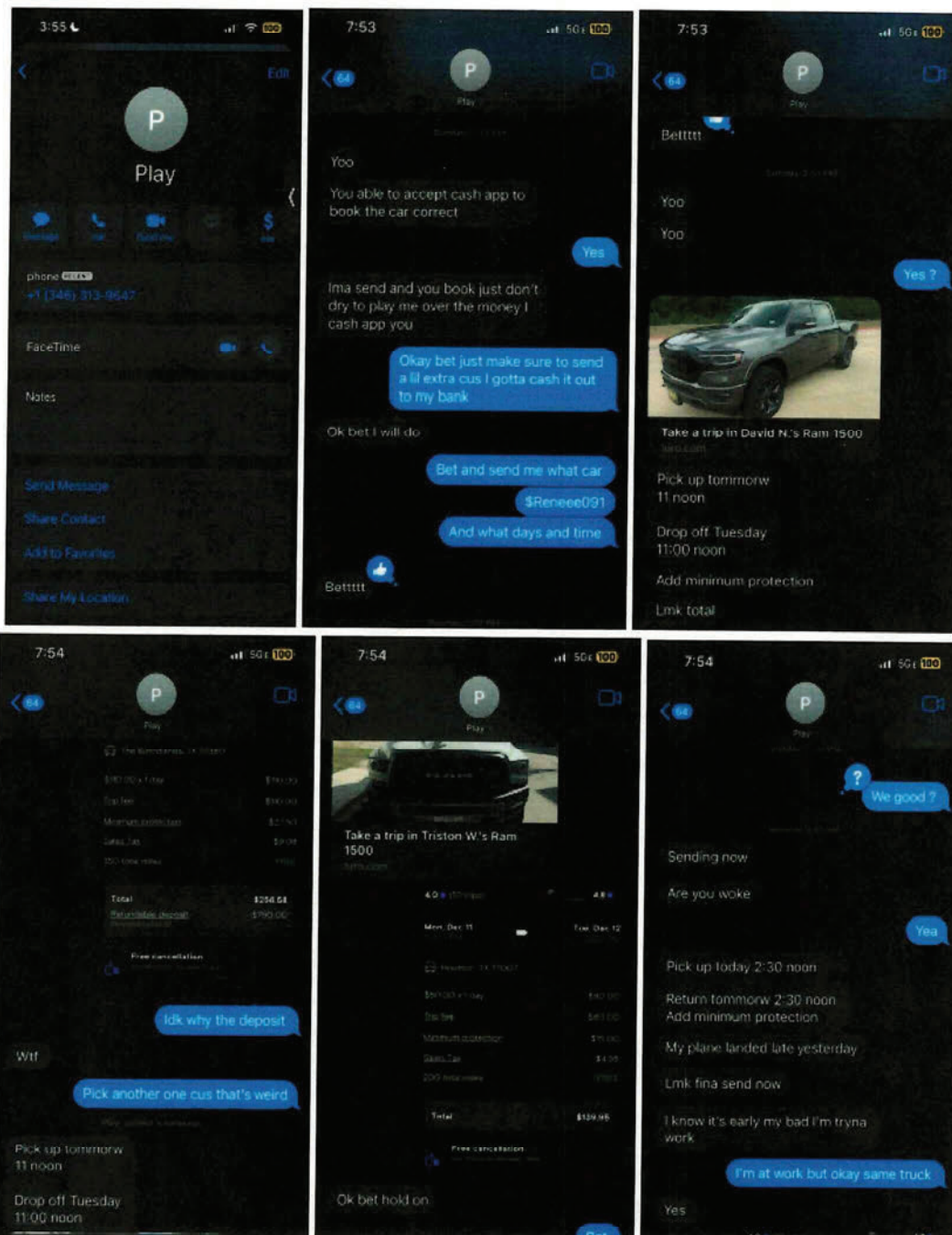


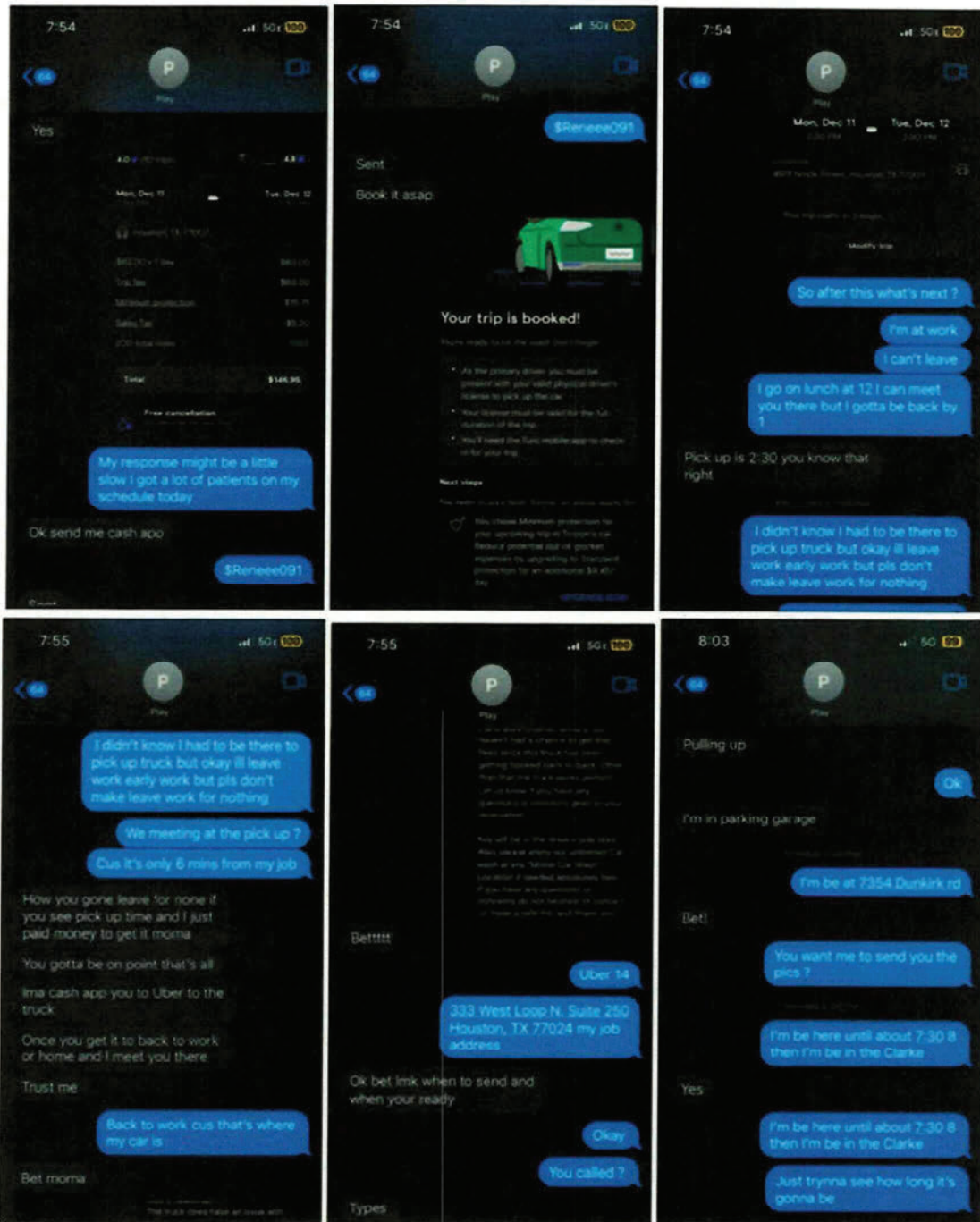
24. Westbrook sends Witness #27 a picture of a Dodge Ram 1500, but upon finding out the deposit price, they decide to pick another vehicle. Westbrook then sends her a link to the vehicle that was subsequently stolen and instructs her to rent the vehicle and states that he will pay her for the reservation. Witness #27 books the vehicle and is paid via Cash App in two separate installments, totaling \$157.

25. Witness #27 tells law enforcement that that on or about December 12, 2023, Westbrook arrives to her place of work, a location within the Houston area, and gets the keys to the Dodge Ram directly from her and then takes possession of the vehicle.

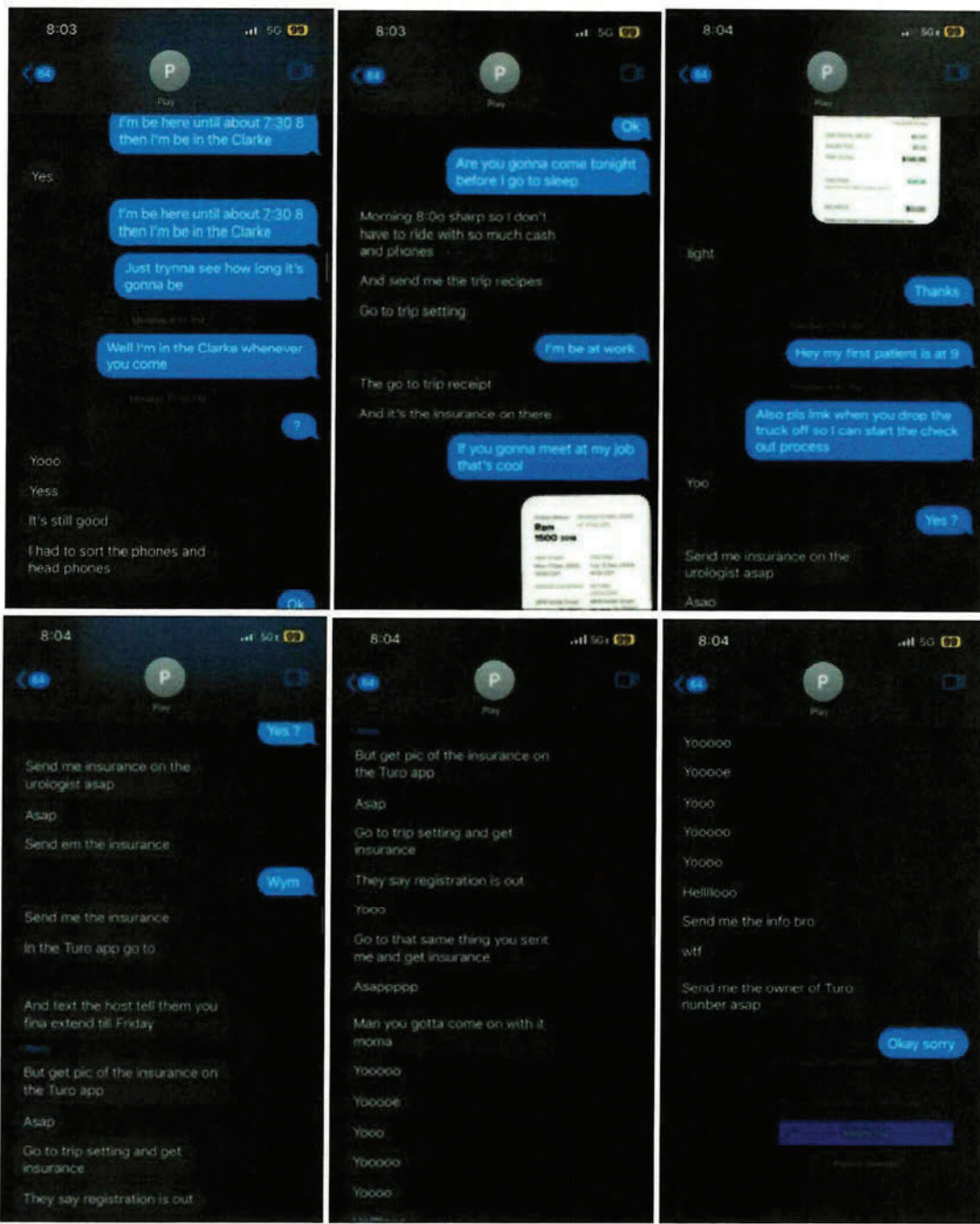
26. As depicted below, the text conversation continues to unfold between the Witness and Westbrook, where Westbrook advises that he needs the insurance info on the vehicle immediately. Westbrook appears to have been either stopped by law enforcement or at the border and needed the insurance information to get out of the situation. The Witness then reaches out to the owner of the vehicle and gets the requested information and proceeds to send it to Westbrook. Westbrook instructs Witness #27 to extend the reservation and the owner then begins to question the Witness about the whereabouts of the vehicle. The owner of the vehicle tells the Witness that the vehicle tracking shows it has crossed into Mexico and Witness #27 begins to text Westbrook about this information. Westbrook at this point is mostly unresponsive with the Witness.

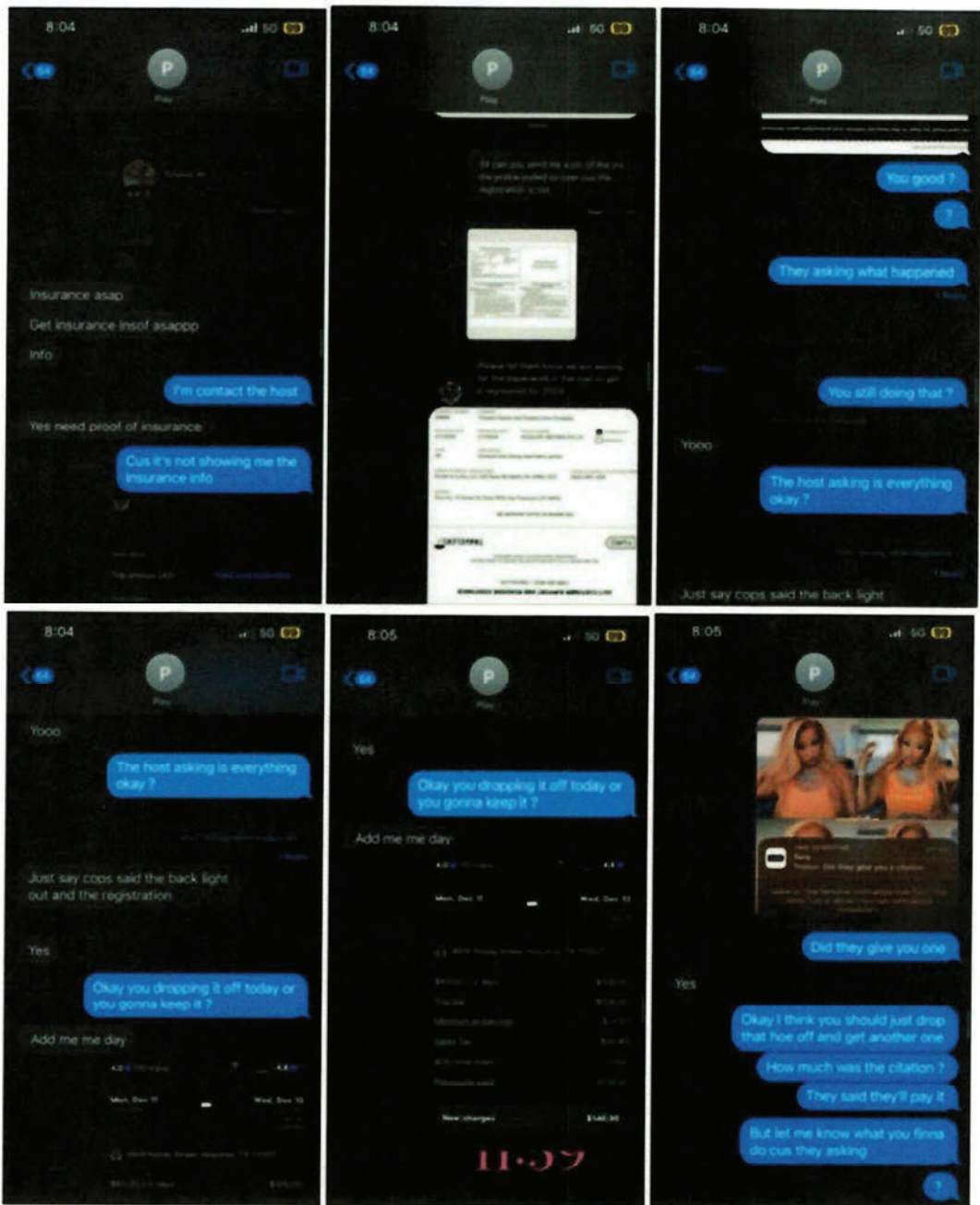
27. The National Insurance Crime Bureau (NICB) confirmed the vehicle crossed into Mexico on December 12, 2023, at 1941 hours, through USCS-RT 2 Box 600 Intl Bridge, Progreso, TX 78596.

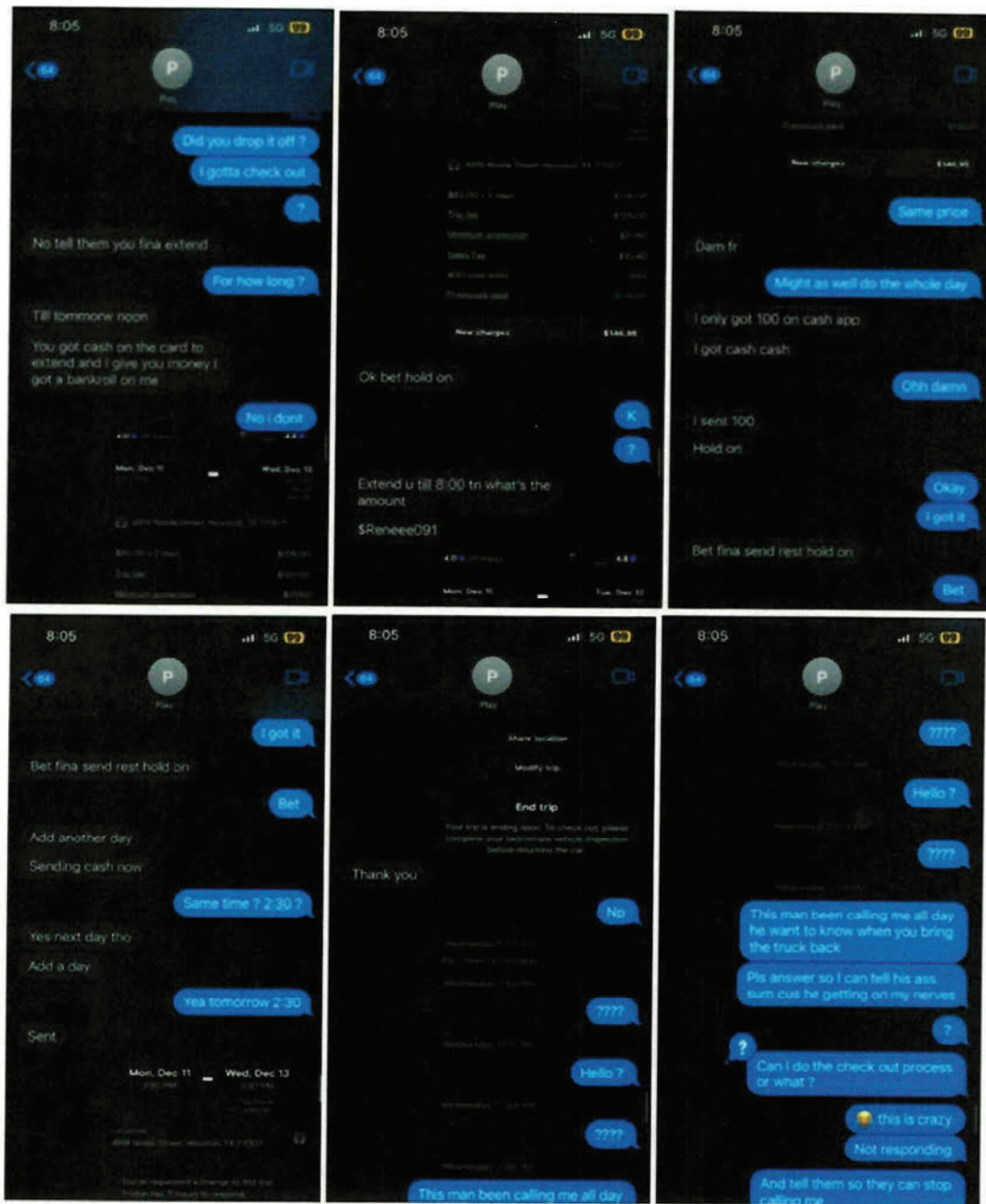




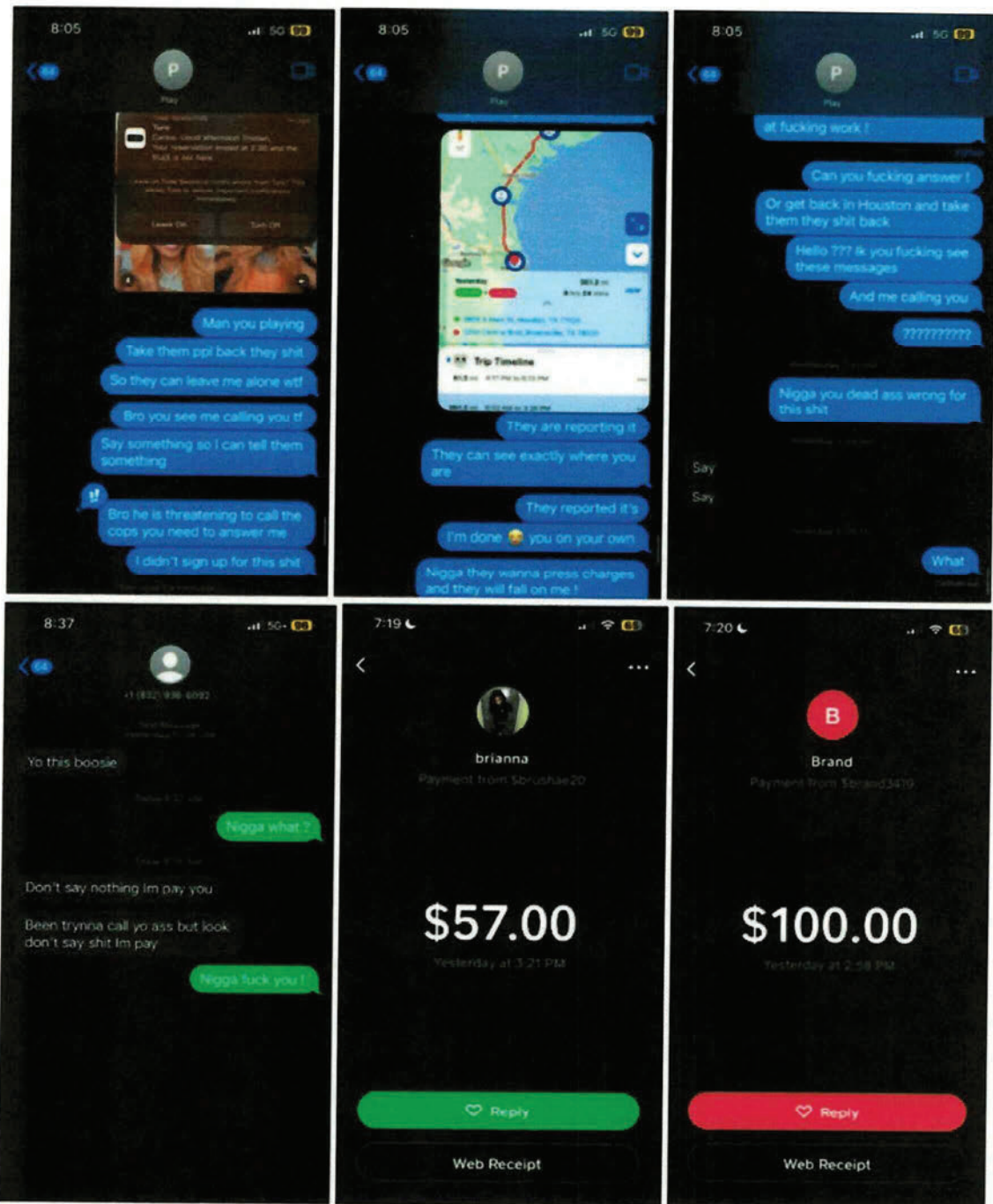












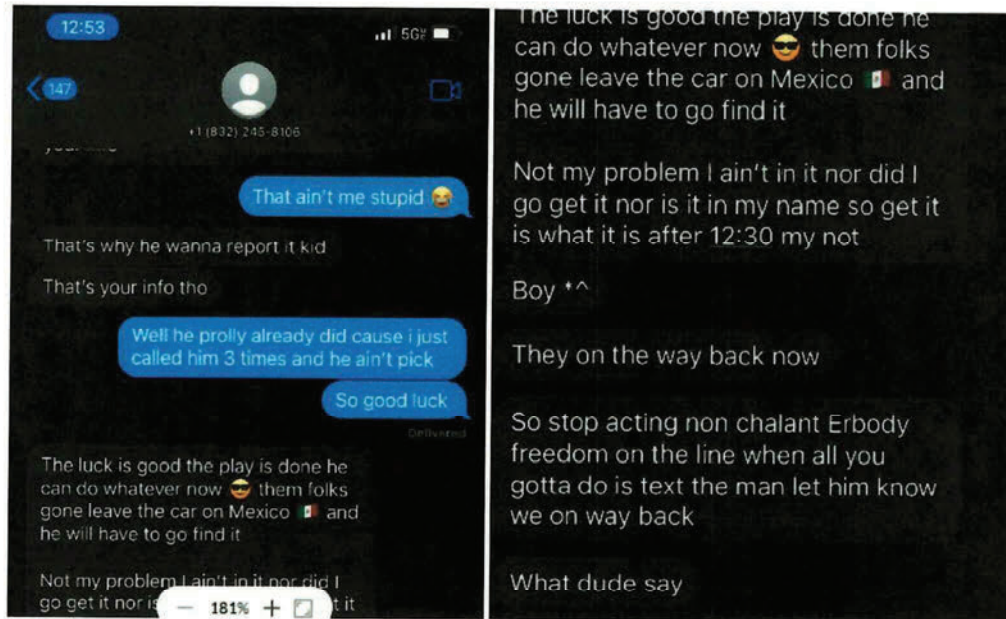
28. Witness #27 contacted the owner of the vehicle again and advised that she gave the vehicle to a person named "Boosie," (which law enforcement identified as a nickname for Kenneth Westbrook) and explained to the owner what happened. On December 18, 2023, the owner of the vehicle then contacted the Houston Police Department and reported the vehicle as being stolen.

29. Witness #27 was interviewed by the FBI on or about January 24, 2024, and confirmed the events described above. In addition, she was able to positively identify Kenneth Westbrook via an image as the same person with whom she communicated with via text message about renting a vehicle on Turo and the person whom she gave the keys to and observed operate the White Dodge Ram that he had her rent on Turo.

#### **HOW THE TURO VEHICLES ARE TIED TO MEXICO**

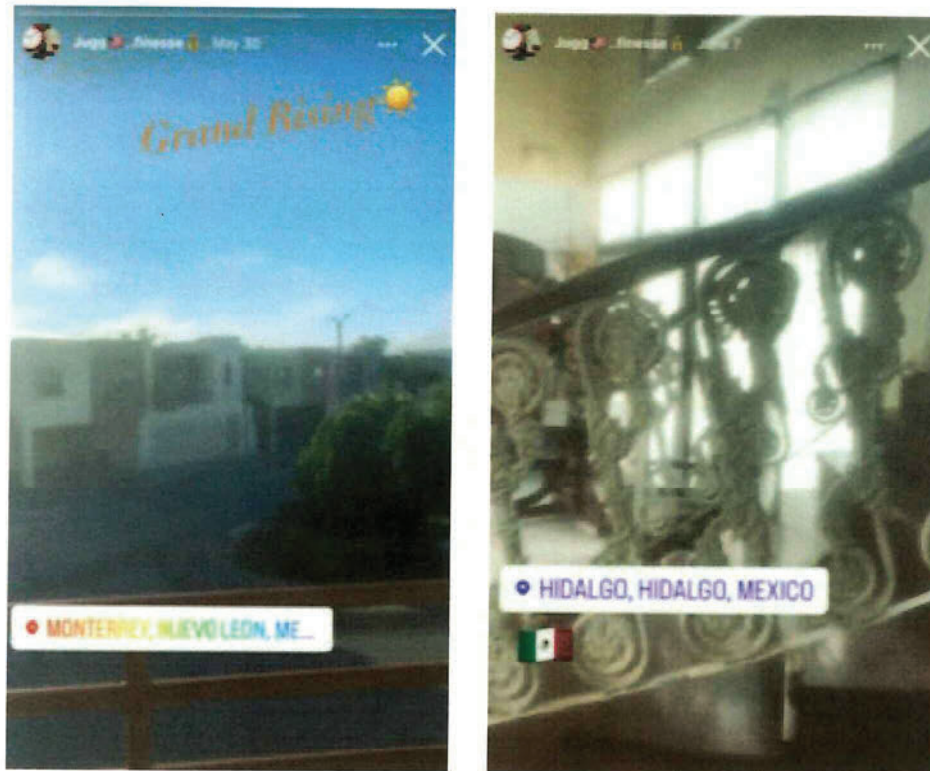
30. Below is a screenshot of an iMessage exchange provided by Witness #6 to a Turo investigator which shows Witness #6 communicating with a phone number 832-245-8106. This phone number belongs to Westbrook according to Witness #1, Witness #6, and information provided to Affiant in Turo's investigation. This iMessage exchange was after Witness #6 gave possession of a Turo vehicle to Westbrook. In the screenshot, Westbrook admits to the Turo

vehicle being in Mexico and Westbrook denying liability of the car being attributed to Westbrook.





31. In turn, below are screenshots of videos that Affiant personally observed on Westbrook's bossmann\_boosie Instagram profile which appear to show Westbrook in Mexico.



32. These screenshots corroborate the information given to me by Turo and the law enforcement reports I reviewed that shows the vehicles are being transported by Westbrook from the United States into Mexico.

33. At least five Turo vehicles which were reported stolen to law enforcement and Turo attributed to Westbrook were recovered in Mexico. Additionally, numerous Turo vehicles which were reported stolen and Turo attributed to Westbrook were reported by GPS in Mexico or at the border of Texas/Mexico.

**CONCLUSION**

Based on the facts in this affidavit, I ask the Court to find probable cause, to approve this Complaint, and to order the issuance of an arrest warrant.

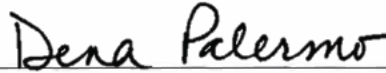
Respectfully submitted,



Alexander Rayas  
Special Agent  
Federal Bureau of Investigation

I find probable cause. Subscribed and sworn to before me by telephone on this date of

April 05, 2024



Honorable Dena Palermo  
United States Magistrate Judge