CASE NUMBER: 49D22-2101-CM-001	393 FILED: 1/13/2021
STATE OF INDIANA MARION COUNTY, ss:	IN THE MARION SUPERIOR COURT CRIMINAL DIVISION
STATE OF INDIANA ) vs. ) Gabriel Sleiman W/Male DOB 5/12/1987	Cause No: 49  INFORMATION COUNT I RECKLESS DRIVING I.C. 9-21-8-52(a)(1) A CLASS C MISDEMEANOR
On this date, the undersigned Deputy Prosecuting Attorney of the Nineteenth Judicial Circuit, being duly sworn on his/her oath (or having affirmed), says that in Marion County, Indiana  COUNT I	
On or about October 18, 2020, G	abriel Sleiman did operate a vehicle and recklessly drove at
an unreasonably high rate of speed under the circumstances as to endanger the safety or property of others;	
all of which is contrary to statute and against the peace and dignity of the State of Indiana.	
	<u>January 13, 2021</u> Date
	<b>RYAN MEARS</b> Marion County Prosecutor 19th Judicial Circuit
	/s/ Mark R. Conner

Deputy Prosecuting Attorney

**State's Witnesses:** Brandon Fletcher 9327 ISP Christopher Hanson 9219 ISP Bryce Thompson

## AFFIDAVIT FOR PROBABLE CAUSE

Your affiant, Trooper Brandon S. Fletcher, swears or affirms and has probable cause to believe the following:

## Case #: 20ISPC013463

On November 20, 2020, at approximately 1133 hours, I was on duty. I was contacted by Indiana State Police Sergeant Joshua Graves. Sgt. Graves informed me of a Crime Stoppers tip regarding a Lamborghini traveling at 213 mph on I-465.

A video recording had been uploaded to YouTube under the account "Bryce Thompson Media" (<a href="https://www.youtube.com/watch?v=C0AYQE9gOrg">https://www.youtube.com/watch?v=C0AYQE9gOrg</a>). The video was uploaded on November 18, 2020. The thumbnail of the video features the Lamborghini insignia with the words "0-213mph. Gabe." Also on November 18, at 2100 hours, Gabe Sleiman posted the video to Facebook, stating "Well, that's all she has in her ..for now! Doing this naturally aspirated took quite a bit of planning, especially since I needed a good stretch of clean road to pull it off. I can't imagine what those people I passed were thinking lol. Thanks to Bryce Thompson for putting this together. It was definitely a fun project!"

The video proceeds to capture a black Lamborghini stationary on I-465 NB at the 9.1mm. After stopping in the left lane of travel, the Lamborghini accelerates northbound in the left lane and partially in the center lane. The Lamborghini continues to accelerate passing other vehicles on the roadway. The Lamborghini reaches a speed of 213 mph before decelerating. Based on the video footage, Detective Chris Hanson used use his training as a crash reconstructionist to calculate the speed of the Lamborghini as it passed another vehicle. Det. Hanson determined determine the Lamborghini passed the second vehicle at 198 mph. According to the display on the dashboard shown throughout the video, the driver was not wearing a seatbelt. The display shows the date was October 18, 2020 and captures various times beginning at 0236 hours and ending at 0253 hours. The dashboard also shows a cellphone connected to the vehicle's infotainment system via Bluetooth, and the driver is seen on an active phone call at the end of the video. The face of the driver is obscured. One of the comments on the video says, "Holy shit, Gabe! You crazy man....you CRAZY!"

Continuing with my investigation, I watched another video posted by "Bryce Thompson Media." The video was titled "Gabe's Lamborghini Huracan LP-610," (<a href="https://www.youtube.com/watch?v=ZvUY0yiiMH4">https://www.youtube.com/watch?v=ZvUY0yiiMH4</a>) and was uploaded on May 27, 2020. This video featured a Honda Civic (IN Reg. ID563) pulling into a two-car garage. The driver of the Civic enters a Black Lamborghini Huracan (IN Reg. KSG) and drives through Indianapolis and the surrounding municipalities. Based on BMV records, the owner of the Civic and the Lamborghini is Gabriel J. Sleiman (DOB: 05/12/1987). Although the license plate is censored in the 213 mph video, it is apparent there are three characters and the coloring of the license plate matches.

Next, I went to the website for Bryce Thompson Media (<u>brycethompsonmedia.net/auto</u>). The only Lamborghini featured in the photography portfolios is the Black Lamborghini Huracan

(IN Reg. KSG) registered to Gabriel Sleiman. I watched two more videos on YouTube. The videos were an interview with Gabriel Sleiman titled "Gabe Sleiman Interview from 700+hp Civic to Lambo - Part 1 and Part 2" (<a href="https://www.youtube.com/watch?v=iTAH3kNXWmQ">https://www.youtube.com/watch?v=iTAH3kNXWmQ</a>). (<a href="https://www.youtube.com/watch?v=86zh7Drq9H8&t=790s">https://www.youtube.com/watch?v=86zh7Drq9H8&t=790s</a>). The videos were uploaded by "Octane TV" on October 30 and November 2, 2020. The videos feature a face-to-face interview with Gabriel Sleiman. During part one, Sleiman discussed his initial involvement in street racing, his growth in his abilities as a mechanic, and what he described as an addiction. He stated he is "fully addicted" and "fully involved" with increasing the performance of vehicles and racing them.

During part two, Sleiman discussed his purchase of the Lamborghini. He said he has owned the Lamborghini for approximately a year. Referring to the Lamborghini, Sleiman said, "The car works. All around, it's just a solid car. And that's why I knew it was the best platform...based on what I see people are doing with them. Ya know, to go fuckin' fast. Street racing. Let me reiterate. What I like to go fast. On the highway." He said his ultimate goal is to "turbo it" and reach 1200 horsepower. Sleiman listed the purchases he has made and concluded the interview by claiming, "And I'll have fun with it for a while, until I get bored. That's how the car mentality is, I know we all share the same sickness, cause let's call it that, and it ain't gonna last like that for very long, but at least, ya know, for a few years. Until I turn it up...This is the next fuckin' step from the Civic, like Civic to this shit, like I'm gonna fuckin' be like floorin' it in this mother fucker. That's like, that's what I want to do! We'll see how it goes, man." All the Youtube videos have been downloaded and saved.

On November 30, 2020, I submitted a search warrant for records included on the Facebook page associated with Gabriel J. Sleiman. The warrant was granted and satisfied by Facebook on December 23, 2020. There was not any additional information related to this incident.

On December 29, 2020, at approximately 1030 hours, I interviewed Sleiman. Sleiman confirmed his Lamborghini was in the 213 mph video but said the videos of his vehicles are fake and deceptively edited. According to Sleiman, his Lamborghini cannot reach 213 mph. He said he edited the videos to make his car appear faster. Sleiman said he has developed a street racing persona and edits videos to attract business to his garage.

Contrary to his claims, Sleiman's model of Lamborghini can reach approximately 211 mph. The driver of the vehicle and the license plate were not clearly visible in the video. This anonymity is counterproductive to Sleiman's alleged goal of attracting business to his garage. Also, according to other interviews posted to social media, Sleiman claimed to regularly participate in street racing for several years prior to opening his garage. Within an hour after I spoke to Gabe Sleiman, the 213 mph video was unable to be viewed on Bryce Thomspon Media's YouTube account.

Next, I contacted the owner of the Bryce Thompson Media YouTube account, Bryce Thompson. According Thompson, Gabriel Sleiman's Lamborghini is the only Lamborghini he has ever taken photos of or filmed. Thompson said he spoke with Sleiman about recording a video, but it was Sleiman's idea. He was unsure of the date and time the recording was made, but

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according to Thompson, Sleiman was driving the Lamborghini during the video. Thompson said he did not ride in the Lamborghini. He said he only setup cameras to record Sleiman while he drove the Lamborghini. Thompson said he was the only person to edit the video. He said the edits he included were stock footage and transitions. Thompson said he did not adjust the speed of the Lamborghini or add other vehicles to the road. When asked if Sleiman had reached 213 mph, Thompson said, "As far as the footage says, Yes."

All these events occurred in Marion County, Indiana.

I swear or affirm under the penalties of perjury that the foregoing representations are true.

Date: 12/29/2020

Affiant Signature: /S/ Trooper Brandon S. Fletcher 9327