

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

UNITED STATES OF AMERICA * **CRIMINAL NO. 22-243**
v. * **SECTION: "T"(5)**
ALICE C. "SHANNON" CHABAUD *

* * *

FACTUAL BASIS

Defendant Alice C. "Shannon" Chabaud ("Chabaud") has agreed to plead guilty. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, the following acts occurred within the jurisdiction of the Eastern District of Louisiana.

From at least 2006 through September 21, 2015, Chabaud worked as a certified public accountant for Band A, a music band based in New Orleans, Louisiana. Chabaud's responsibilities included managing the band's bank accounts, receiving and depositing income, making payments, and otherwise handling all aspects of the band's finances. In order for Chabaud to execute her duties, Band A gave Chabaud authority to access two bank accounts at Regions Bank. Regions Bank is headquartered in Birmingham, Alabama, and engages in interstate commerce. On September 21, 2015, members of Band A terminated Chabaud's employment with the band.

After her termination, Chabaud did not relinquish her access to Band A's bank accounts. Instead, she continued to access the two accounts without the knowledge or permission of Band A in order to divert funds for her own benefit. From September 21, 2015, through May 26, 2020, Chabaud used Band A's bank account information to access Band A's accounts and fraudulently divert a total of \$207,607.95 for her own personal use. She used these funds to pay her own

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personal American Express and Citibank credit card bills and otherwise transferred funds to her personal accounts at Regions Bank. On or about May 26, 2020, members of Band A discontinued Chabaud's access to their accounts after discovering that she had been accessing them for her own benefit and without their authorization.

As part of the offense, on April 22, 2019, Chabaud emailed an electronic payment request form from New Orleans to Warner Music Group (WGM), which is based on California. WGM had sent the document to Chabaud with the understanding that she was still employed by Band A. On the form that she returned to WGM, Chabaud falsely represented herself to be Band A's business manager. She instructed WGM to make future royalty payments electronically to one of Band A's bank accounts at Regions Bank. This account was one of the accounts that Chabaud could still access. Chabaud used Band A's bank account information on the form without Band A's authorization. As a result, Chabaud was able to obtain more than \$1,000.00 in U.S. currency from Band A's Regions Bank accounts between April 22, 2019, and April 21, 2020.

Sentencing Stipulation

The parties stipulate and agree, for the purposes of sentencing, that Chabaud caused a loss to Band A of \$207,607.95.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by Chabaud, and it is not a complete statement of all facts described by Chabaud to the government. Rather, it is a minimum statement of facts intended to prove the necessary factual

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