

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2018 MAR 22 P 3: 24

WILLIAM W. BLEVINS
CLERK

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR VIOLATION OF THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA

* CRIMINAL NO.

18-66

v.

* SECTION:

SECT. J MAG. 5

TODD DELAUNE

* VIOLATION: 18 U.S.C. § 922(g)(9)

* * *

The Grand Jury charges that:

COUNT 1

On or about February 12, 2018, in the Eastern District of Louisiana, the defendant, **TODD DELAUNE**, having been convicted on August 7, 2013, of simple battery, a misdemeanor crime of domestic violence, in violation of LA-R.S.A. 14:35, in the Seventeenth Judicial District Court for the Parish of Lafourche, Case Number C-513966, did knowingly possess in and affecting interstate commerce, ammunition: one box of Winchester 12 gauge shotgun shells (8 in box); two full boxes of Winchester 12 gauge shotgun shells (50 rounds); one full box of Federal 12 gauge shotgun shells (25); 180 .22 caliber Remington bullets; one full box of Eley .22 caliber bullets (50 rounds); one Promag 50 round .22 caliber magazine; and two Eagle 35 round .22 caliber magazines; all in violation of Title 18, United States Code, Section 922(g)(9).

Fee usa
 Process _____
 Dktd _____
 CtRmDep _____
 Doc. No. _____

NOTICE OF AMMUNITION FORFEITURE

1. The allegations of Count 1 of this Indictment are re-alleged 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 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 1, the defendant, **TODD DELAUNE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in knowing violations of Title 18, United States Code, Section 922(g)(9), as alleged in Count 1 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of 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 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, Section 922(g)(1).

A TRUE BILL:



DUANE EVANS
UNITED STATES ATTORNEY

A handwritten signature in cursive script that reads "Michael E. McMahon".

MICHAEL E. MCMAHON

Assistant United States Attorney
Louisiana Bar Roll Number 10095

New Orleans, Louisiana
March 22, 2018