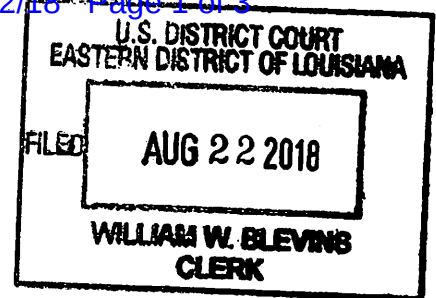


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA



UNITED STATES OF AMERICA

*

CRIMINAL NO. 18-155

v.

*

SECTION: A

KEITH D. BOUDREAUX

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* * *

FACTUAL BASIS

Defendant **KEITH D. BOUDREAUX** ("BOUDREAUX") has decided to enter a plea of guilty to the one-count Bill of Information. Were this matter brought to trial, the United States would prove, through competent witnesses and documentary evidence, the following facts beyond a reasonable doubt:

BOUDREAUX owns and operates Tangi Turtle Farm in Ponchatoula, Louisiana. **BOUDREAUX** exports fresh water turtles that he raises on his farm to domestic and international buyers. **BOUDREAUX** is a holder of a CITES Master File permit that allows him to export his turtles around the world on an expedited basis. The CITES Master File permit was issued to him by the U.S. Fish and Wildlife Service ("USFWS") on July 13, 2011. This permit is valid for one year, and allows turtle farmers to obtain multiple partially-completed CITES export documents from the USFWS at one time, thus eliminating the need to apply individually for documentation for each single export. Under this program, turtle farmers are not allowed to export turtles produced by another breeder or turtles captured in the wild. The paperwork for the permit requires each permit holder to certify that they only export specimens hatched and bred at their facility. Turtle farmers are also required to submit to the USFWS a health certificate and lab report from a licensed veterinarian, stating that the turtles have been inspected and are free of salmonella and

AUSA
Defendant
Defense Counsel

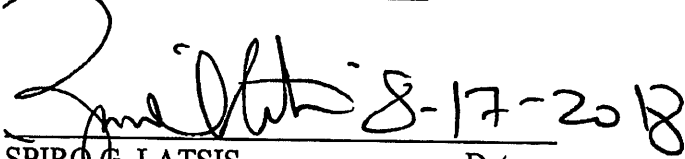
other infectious diseases. The lab report and health certificate must also contain the farmer's turtle farmer code tracking number. This tracking measure allows the USFWS to ensure that turtle farmers enrolled in the CITES Master File permit program are only exporting turtles that were bred and raised on their farms.

In July 2014, an inspector with the USFWS conducted a spot-check of the paperwork that **BOUDREAUX** submitted to their office with the turtle shipments he sent overseas. During the check, the inspector discovered that on August 16, 2013, **BOUDREAUX** knowingly submitted a CITES form (3-210 A), a health certificate for turtles (Louisiana Department of Agriculture form AHS-24-97) and a certificate of inspection for pet turtle and eggs (Louisiana Department of Agriculture form AHS-24-98) to the USFWS in connection with a shipment of 1500 Midwest False Map turtles having a market value of \$2,550 to a buyer in the Netherlands. In the CITES form **BOUDREAUX** falsely stated that the turtles were bred and hatched from parental stock maintained at Tangi Turtle Farm. However, the health certificate and inspection mentioned above showed that those turtles came from a turtle farm in Monterey, Louisiana.

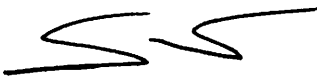
After discovering this illegal shipment, the inspector then conducted an audit of all the turtles that **BOUDREAUX** shipped under his CITES permit. The audit revealed that **BOUDREAUX** submitted lab reports and health certificates that were issued to other turtle farmers in connection with twenty-nine shipments of false map turtles that he exported to overseas buyers. Those illegal shipments took place from 2012 to 2014 and had a total market value of \$61,950. After discovering the illegal shipments, special agents with USFWS interviewed the ten turtle farmers that bred and raised the turtles that **BOUDREAUX** illegally exported under his Master File permit. All of the farmers acknowledged that they sold the subject turtles to **BOUDREAUX** from 2012 to 2014. On December 13, 2016, the agents then interviewed

BOUDREAUX at his home about the illegal shipments, and he admitted to exporting turtles that were bred and raised by other farmers under his Master File permit.

APPROVED AND ACCEPTED:



SPIRO G. LATSIS Date
Assistant United States Attorney



MATTHEW CHESTER Date
Attorney for the Defendant



KEITH D. BOUDREAUX Date
Defendant