

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO: 18-66

 v. * SECTION: "J"

TODD DELAUNE *

 * * *

FACTUAL BASIS

The defendant, Todd Delaune, is pleading guilty to the one-count indictment charging him with possession of ammunition after his conviction for a misdemeanor crime of domestic violence, violating Title 18, United States Code, Section 922(g)(9). Delaune is pleading because he is guilty of the charged crime. The following proffer of the government's evidence is intended only to provide the Court with enough evidence to satisfy the mandate of Rule 11(b)(3) of the Federal Rules of Criminal Procedure. If this case were to proceed to trial, the United States could prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the defendant's guilt:

On August 7, 2013, Delaune was convicted 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.

Subsequently, as part of a criminal investigation into Delaune's conduct, deputies from the Lafourche Parish Sheriff's Office executed a search warrant on February 12, 2018, at the defendant's residence in Larose, Louisiana, in the Eastern District of Louisiana. Pursuant to that

search, deputies recovered the ammunition enumerated in the indictment. Delaune also claimed ownership of the ammo, and that admission would be offered against him.

READ AND APPROVED:



MICHAEL E. MCMAHON
Assistant United States Attorney

SEPT. 6, 2018
Date



GARY V. SCHWABE, JR.
Counsel for Defendant

9-6-18
Date



TODD DELAUNE
Defendant

9-6-18
Date