

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 21-143

v. \* SECTION: "T"

RENALDO RUFFIN \*

\* \* \*

FACTUAL BASIS

The above-named defendant, **RENALDO RUFFIN**, has agreed to plead guilty to Counts 1 of the Superseding Bill of Information in which he is charged with being a felon in possession of a firearm, and Count 2 of the Superseding Bill of Information, in which he is charged with being a felon in possession of ammunition. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts, among others, to support the allegations of Counts 1 and 2 against defendant **RENALDO RUFFIN** ("RUFFIN"):

On March 17, 2016, in the Orleans Parish Criminal District Court, RUFFIN was convicted of possession of heroin, in violation of Louisiana R.S. 40:966(c)(1), under case number 526-061 "H." RUFFIN was sentenced to a term of imprisonment of five years. On a "Waiver of Constitutional Rights" form, which RUFFIN signed and initialed, RUFFIN acknowledged that the maximum sentence for this offense was 20 years of imprisonment.

On August 31, 2020, a Trooper from the Louisiana State Police ("LSP") observed a 2017 Nissan Altima bearing Louisiana license plate [REDACTED] (the "Altima") traveling at approximately 86 miles per hour in a 60-mile-per-hour zone on U.S. 90B at around Terry Parkway, in Marrero,

AUSA AS  
Defendant RR  
Defense Counsel VWJ

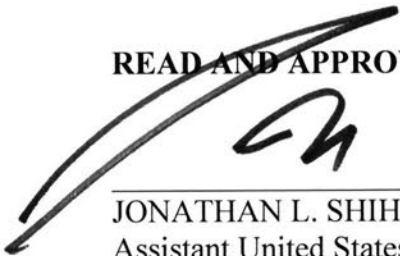


ammunition. An examination of the ammunition revealed that it was manufactured by Poonsang Metal Manufacturing Co., Ltd. in South Korea.

An expert witness from the ATF would testify that the aforementioned Glock.23 firearm and the 30 rounds of Poonsang Metal Manufacturing Co., Ltd. ammunition was not manufactured in the state of Louisiana, and therefore, had entered into interstate commerce prior to August 31, 2020 and January 24, 2022, respectively.

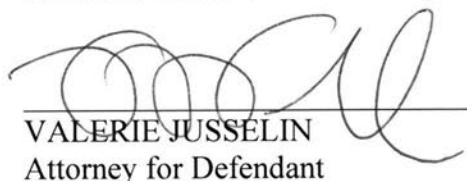
This proffer of evidence is not intended to constitute a complete statement of all facts known by **RUFFIN**, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for **RUFFIN's** plea of guilty to these crimes.

**READ AND APPROVED:**

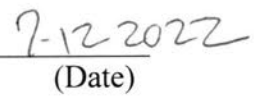



JONATHAN L. SHIH  
Assistant United States Attorney


  
(Date)





VALERIE JUSSÉLIN  
Attorney for Defendant

  
(Date)

  
RENALDO RUFFIN  
Defendant

  
(Date)

AUSA   
Defendant   
Defense Counsel 