

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 21-153  
v. \* SECTION: "T"  
JERRY TRABONA \*  
\* \* \*

FACTUAL BASIS

The defendant, **JERRY TRABONA** (“**TRABONA**” or “**DEFENDANT**”), has agreed to plead guilty to Count One of the superseding indictment now pending against him, charging **TRABONA** with conspiring to pay voters in an election in which a federal candidate appeared on the ballot in violation of Title 18, United States Code, Section 371, and Title 52, United States Code, Section 10307(c). The Government and the **DEFENDANT** hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the **DEFENDANT** is pleading guilty. If this matter were to proceed to trial, the Government and the **DEFENDANT** further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the superseding indictment now pending against the **DEFENDANT**.

The defendant, **TRABONA** was a resident of Amite, Louisiana, within the Eastern District of Louisiana. Beginning in or about 2005, and continuing through at least in or about January 2020, **TRABONA** was the Chief of Police of the Amite City Police Department.

AUSA MTB  
Defendant J.T.  
Defense Counsel [Signature]

In 2016, **TRABONA** ran for reelection as the Chief of Police of Amite City and was on the ballot during the 2016 Open Primary Election. The 2016 Open Primary Election was held on November 8, 2016, and involved candidates for federal office, including candidates for President of the United States, United States Senator, and United States Representative. During the same election, KRISTIAN HART (HART) was running for a seat on the Amite City Council.

Between January 1, 2016 and December 19, 2016, **TRABONA** agreed with HART and others to commit the offenses of paying and offering to pay for voting when a federal candidate was on the ballot.

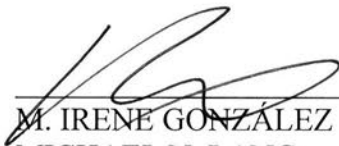
It was an object of the conspiracy for **TRABONA**, HART, and others to pay voters to cast their votes for specific candidates on the ballot in Tangipahoa Parish during Louisiana's 2016 Open Primary Election and 2016 Open General Election, including **TRABONA** and HART.

During, and in furtherance of the conspiracy, **TRABONA** met with HART and gave him money to pay voters to vote for **TRABONA**. Thereafter, with **TRABONA**'s knowledge, HART paid individuals to pay voters to vote for **TRABONA** and paid voters to vote for HART.

**Limited Nature of Factual Basis**

This proffer of evidence is not intended to constitute a complete statement of all facts known by **JERRY TRABONA** and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **JERRY TRABONA**.


**READ AND APPROVED:**

  
\_\_\_\_\_  
M. IRENE GONZÁLEZ  
MICHAEL N. LANG  
ROSALEEN T. O’GARA  
Attorneys for the United States

7/20/22  
Date

  
\_\_\_\_\_  
JERRY TRABONA  
Defendant

7/20/22  
Date

  
\_\_\_\_\_  
WALTER F. BECKER  
AMY L. MCINTYRE  
WILLIAM M. KELLY  
CHARLES V. GENCO

7/20/22  
Date