

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**


UNITED STATES OF AMERICA * **CRIMINAL NO. 21-153**
v. * **SECTION: "T"**
KRISTIAN HART *
* * *

FACTUAL BASIS

The defendant, **KRISTIAN HART** (“**HART**” or “**DEFENDANT**”), has agreed to plead guilty as charged to the Superseding Indictment charging **HART** with one count of 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), and three counts, including Counts Five, Six, and Seven of the Superseding Indictment, charging **HART** with paying and offering to pay voters in an election in which a federal candidate appeared on the ballot, in violation of Title 52, United States Code, Section 10307(c), and Title 18, United States Code, Section 2. The government and the **DEFENDANT** hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the **DEFENDANT** is pleading guilty. The government and the **DEFENDANT** further stipulate that the government would have proven the following facts, beyond a reasonable doubt, to support the allegations in Counts One, Five, Six, and Seven of the Superseding Indictment now pending against the **DEFENDANT**.

HART is a resident of Amite, Louisiana, within the Eastern District of Louisiana, and has been a City Councilmember on the Amite City Council since 2016. Beginning in at least 2016 and continuing through at least in or about November 2020, **HART** participated in vote buying

AUSA _____
Defendant _____
Defense Counsel _____



activities on behalf of certain political candidates and campaigns in various elections, and for his own 2016 and 2020 campaigns for Amite City Council.

In 2016, **HART** successfully ran for City Council of Amite, Louisiana, a town located in Tangipahoa Parish. In both Louisiana's 2016 Open Primary Election and Open General Election, a federal candidate appeared on the ballot in the Eastern District of Louisiana. During this 2016 election period, **HART** agreed to work with and on behalf of co-defendant JERRY TRABONA (TRABONA), who was running for the position of chief of police in Amite, Louisiana, to buy votes for **HART** and TRABONA's candidacies. As part of and in furtherance of their agreement, TRABONA directed individuals who inquired about working as vote buyers on TRABONA's behalf to **HART**. **HART** provided those individuals with cash to buy votes, which **HART** indicated was from TRABONA, and directions to report back after they had paid voters to vote.

As part of and in furtherance of **HART** and TRABONA's agreement, **HART** employed vote buyers to identify voters in Tangipahoa Parish who had not yet voted and then take them to the polls and pay them for their vote. During the early voting periods preceding the 2016 Open Primary and 2016 Open General Election, **HART** recruited and engaged individuals to transport potential voters to the polls, and **HART** provided them with cash they were to use to pay the voters for their votes. **HART** coordinated communications with these individuals through in-person communications and via cellular telephone. Typically, **HART** provided the vote buyers working for him with several hundred dollars cash and directed them to provide potential voters with \$10 or \$20 in cash in exchange for their votes. These vote buyers transported the voters to the polls and told the voter which candidate or candidates to vote for or provided the voters with sample ballots containing candidate names or numbers, which included those of **HART** and TRABONA.

The individual vote buyers, according to **HART'S** directives, then paid those individuals for their votes with the cash **HART** provided. Frequently, **HART** asked the vote buyers whom he recruited to maintain lists of the voters they took the polls and paid to vote. **HART** later asked for those lists in order to verify the votes bought by those individuals working for him. **HART** often met with vote buyers working for him at the end of the day at various locations throughout Amite, including Butler Town Park, to pay them and receive lists or a description of the voters his buyers transported to the polls and paid to vote. During the 2016 Open Primary and 2016 Open General Election period, **HART** oversaw individuals who bought votes on behalf of his and TRABONA's political campaigns.

During the 2016 Open Primary and 2016 Open General Elections, **HART** also personally paid voters for their votes for himself and TRABONA and drove several individuals to the polling locations using his own vehicles. **HART** provided these voters with cash directly to cast their votes during the 2016 Open Primary and Open General elections. **HART** also provided them with sample ballots containing candidate names and numbers, directing them who to vote for.

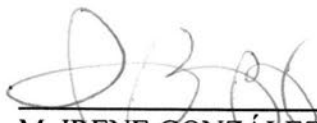
Following the 2016 Open Primary and 2016 Open General elections, **HART** continued to engage in vote buying. During **HART'S** re-election campaign in 2020, during which **HART** ran for re-election for Amite City Council, **HART** aided and abetted others, including an individual who worked for **HART**, to pay voters for voting. On or about October 17, 2020, that individual picked up voters using **HART'S** Chevrolet Silverado pickup truck, drove them to the polling location at the arena in Amite, Louisiana, and, at the direction of **HART**, paid each voter \$20 in cash provided by **HART** for voting.

During the 2016 and 2020 election periods, a federal candidate for office appeared on the ballot.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **KRISTIAN HART** 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 **KRISTIAN HART**.

READ AND APPROVED:




M. IRENE GONZÁLEZ
MICHAEL N. LANG
ROSALEEN T. O'GARA
Attorneys for the United States of America

7/20/2022
Date



KRISTIAN HART
Defendant

7/20/22
Date



JOHN S. MCLINDON
A. GREGORY ROME
Attorneys for the Defendant

7-20-22
Date

AUSA
Defendant
Defense Counsel
