

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

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
JOSHUA JAMBON	*	VIOLATION: 26 U.S.C. § 245(b)(2)(C)
	* * *	

FACTUAL BASIS

The defendant, **JOSHUA JAMBON** (“**JAMBON**” or the “defendant”), has agreed to plead guilty to Counts 1 and 2 of the pending Bill of Information, which charge **JAMBON** with using, and attempting to use, force and threat of force, to willfully injure, intimidate, and interfere with M.R. and N.S. because of their race and because they were enjoying employment, and any perquisite thereof, by any private employer and any agency of any State or subdivision thereof, in violation of Title 18, United States Code, Section 245(b)(2)(C). Should this matter have proceeded to trial, the Government would prove beyond a reasonable doubt, through the introduction of competent testimony and admissible evidence, the following facts:

On or about September 18, 2012, M.R. and N.S. were employed in Grand Isle, Louisiana as part of a work crew tasked with cleaning up debris from Hurricane Isaac. M.R. and N.S. were wearing fluorescent-colored vests and work helmets that identified them as members of the crew. M.R. and N.S. are African-American; all of the other crew members except one (B.W.) are white. While the crew, including M.R. and N.S., was taking a break under a tree, **JAMBON** approached the group. When **JAMBON** saw M.R. and N.S., he understood that they were part of the work crew. **JAMBON** was upset because he believed a different work crew had damaged his property, and he asked to speak to the crew’s supervisor.

During this interaction with the work crew, **JAMBON** called M.R. and N.S. “niggers,” “monkeys,” and “black motherfuckers.” **JAMBON** also referred to M.R. and N.S. as “lazy niggers sitting under the tree.” **JAMBON** then approached N.S. and hit her in the face. **JAMBON** hit N.S. because of her race and because of her employment with the work crew. **JAMBON** then approached M.R. and hit her in the face. **JAMBON** hit M.R. because of her race and because of her employment with the work crew. At the time **JAMBON** hit M.R. and N.S., he knew he had no legal justification to do so.

JAMBON then saw B.W. filming him on her cell phone. **JAMBON** initiated a physical struggle with B.W. in an attempt to take her cell phone so that he could delete the video. At the time of this incident, **JAMBON** knew he had no legal justification to initiate a struggle with B.W. or to take her cell phone.

Both the Government and the defendant, **JOSHUA JAMBON**, do hereby stipulate and agree that the above facts are true, and that they set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty.

JOSHUA JAMBON
Defendant

Date

EDWARD J. CASTAING, JR., ESQ.
Attorney for the Defendant

Date

RISA BERKOWER
Trial Attorney, Civil Rights Division
U.S. Department of Justice

Date

MATTHEW S. CHESTER
Assistant United States Attorney
Texas Bar No. 24045650

Date