

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

UNITED STATES OF AMERICA * **CRIMINAL NO.: 18-158**

v. * **SECTION: "S"**

BRIDGET LAMBERT *

* * *

FACTUAL BASIS

The defendant, **BRIDGET LAMBERT**, (“**LAMBERT**”), agrees to plead guilty to one count of conspiracy to commit forced labor, (18 U.S.C. § 1589) in violation of 18 U.S.C. § 371. If this matter were to go to trial, the defendant agrees that the Government would prove the following facts beyond a reasonable doubt:

In 2015, **LAMBERT** lived with her mother, R.K., her stepfather, T.J.K., her brother, J.L., and her stepsister, T.K. (who is T.J.K.’s biological daughter), along with her other family members (collectively, “the family”). Until late August 2015, the family lived together in a home in Kentwood, Louisiana (“the Kentwood home”). In August 2015, R.K., T.J.K., J.L., and T.K. moved to a property containing a mobile home at 57509 Rushing Lane, Amite, Louisiana (“the Rushing Lane property”). **LAMBERT** did not move to the Rushing Lane property, but, starting in August 2015, she visited the property regularly. From January 2016 until June 30, 2016, these visits became more frequent: **LAMBERT** visited the Rushing Lane property at least once every week, and she lived there one week out of every three weeks.

D.P. is a relative of LAMBERT's mother R.K. In 2015, D.P. and her mother came to live with the family in the Kentwood home. D.P. has been diagnosed with disabilities, including autism. D.P.'s mother died on August 12, 2015. Shortly afterward, D.P. moved with R.K., T.J.K., J.L., and T.K. to the Rushing Lane property because she had nowhere else to go.

Throughout the time D.P. and the family lived at the Rushing Lane Property, LAMBERT, R.K., T.J.K., J.L., and T.K. collectively subjected D.P. to consistent physical violence, threats of physical violence, psychological and verbal abuse, abuse of legal process, and psychological manipulation. The family did this for the purpose of obtaining uncompensated household labor and services from D.P. LAMBERT was aware of this plan among her other family members, agreed to participate in it, and engaged in acts both on her own and with other members of her family that advanced the plan's objective.

Initially at the Rushing Lane property, D.P. was permitted to sleep inside the family's mobile home on a mattress on the floor. However, as part of the family's plan to obtain uncompensated household labor and services from D.P., the family physically restrained D.P. for several months in 2016 in order to maintain control over her and to prevent her from escaping. LAMBERT knew that for a period of months the family was locking D.P. in a small backyard shed at night. LAMBERT observed R.K. instruct T.K., J.L., and other family members to lock D.P. in the shed at night by fastening a padlock on the shed's door. LAMBERT knew that T.K., J.L., and the other family members complied with these orders.

LAMBERT knew that throughout the time D.P. lived at the Rushing Lane property, the family required D.P. to complete housework and yard work in exchange for food and water.

Each day, D.P. was required to clean up the yard. D.P. was often also required to clean the bathroom in the mobile home, clean the mobile home's kitchen, and wash the family's dishes, among other tasks. D.P. was not paid for any of her work. LAMBERT knew that, at R.K. and T.J.K.'s direction, D.P. was not permitted to eat the same food as the family; D.P. was required to eat food of lesser quality. Additionally, if D.P. did not complete her work to R.K.'s or T.J.K.'s liking, or if D.P. did not complete the work quickly enough, R.K. and T.J.K. denied D.P. food. Because of this, D.P. lost a substantial amount of weight while living at the Rushing Lane property.

As LAMBERT knew, throughout the time D.P. lived at the Rushing Lane property, if D.P. did not complete her housework or yardwork to R.K.'s or T.J.K.'s liking, D.P. would be physically assaulted. LAMBERT was aware that, on more than one occasion, T.J.K. choked and kicked D.P. and that R.K. threw canned goods at D.P. for this reason.

On several occasions, LAMBERT observed members of the family force D.P. to do housework in a demeaning fashion. Once, T.J.K. and R.K. forced D.P. to clean the kitchen and walls with a toothbrush. On one other occasion, T.J.K. and R.K. required D.P. to cut the grass in the yard using scissors.

Throughout the time D.P. lived at the Rushing Lane property, each member of the family, including LAMBERT, routinely physically assaulted D.P. LAMBERT saw this regular physical abuse and knew that these assaults often caused D.P. physical injuries. On one occasion, LAMBERT struck D.P. over the head with a wood board. The strike caused D.P. to bleed from her head such that blood dripped onto D.P.'s shirt and onto the floor. D.P. was not

provided professional medical care because the family did not want anyone to know that they were abusing D.P. Instead, one of the family members used glue to close the wound. On one other occasion, LAMBERT held D.P.'s arm while T.J.K. burned D.P. with a cigarette lighter by placing the flame directly on D.P.'s hand. While being burned, D.P. cried, stated that the flame was causing her pain, and attempted to pull her arm away from the flame. However, LAMBERT held D.P.'s arm in place preventing D.P. from escaping the flame. At the time, T.J.K. told D.P. that she was being punished for talking back to R.K. LAMBERT also knew of the following instances, among others, of physical violence against D.P.: T.J.K. shot D.P. with a BB gun at close range while telling D.P. she was a "retard" who "deserved to die;" R.K. and T.J.K. hit D.P. with a wooden paddle; T.J.K. punched D.P. in the head multiple times with his fist; at R.K.'s insistence, her minor children kicked and punched D.P. telling her that she was dumber than they were; T.K., at R.K.'s direction, held D.P. underwater in the mobile home's bathtub despite D.P. struggling to come up for air. The purpose and effect of these physical assaults was to scare D.P. into continued compliance with the family's orders, including, among other things, housework and yard work.

Throughout the time D.P. lived at the Rushing Lane property, LAMBERT, J.L., T.J.K., and R.K. routinely threatened D.P. These threats included, among other things, threats to shoot D.P. if she ever tried to escape the Rushing Lane property, threats to beat her if she disobeyed the family's orders, and threats to kill her if she ever reported the family to law enforcement. On one occasion, LAMBERT witnessed J.L. threaten to cut D.P.'s throat if she ever spoke to law

enforcement. The purpose and effect of these threats was to scare D.P. into continued compliance with the family's orders, including, among other things, housework and yard work.

Throughout the time D.P. lived at the Rushing Lane property, each member of the family, including LAMBERT, routinely verbally and psychologically abused D.P. The family regularly called D.P. "stupid," and "retarded," in reference to D.P.'s disability. LAMBERT heard R.K. say, in reference to D.P., "This retarded girl will do anything you say." On one occasion, LAMBERT observed R.K. force D.P. to open an urn containing D.P.'s deceased mother's ashes, pour the ashes into a bowl with milk, and eat the ashes with a spoon. LAMBERT saw that D.P. clearly did not want to comply with R.K.'s order, and that the family watched and laughed at D.P. as she did so. LAMBERT saw D.P. vomit onto the table several minutes after consuming the ashes. On one other occasion, LAMBERT saw T.J.K. and J.L. fill a bucket with urine and feces from the family's septic tank and throw the human waste at D.P. D.P., who was covered from head to toe with the urine and feces, began screaming while J.L. laughed. J.L. then sprayed D.P. with water from the hose to clean her off. D.P. was not allowed to shower and was not given soap to clean off the human waste. The family also forced D.P. to lick soiled underwear and eat dog feces placed on bread. In addition, J.L. and R.K. forced D.P. to simulate sexual acts with a jalapeño pepper and grab the genitals of male members in the household. The purpose and effect of this verbal and psychological abuse was to obtain D.P.'s continued compliance with the family's orders, including, among other things, housework and yard work.

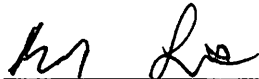
Throughout the time D.P. lived at the Rushing Lane property, LAMBERT was aware that R.K. and T.J.K. manipulated the legal process to advance the conspiracy. As an example,

LAMBERT knew that R.K. and T.J.K. forced D.P. to use methamphetamine and prescription painkillers. LAMBERT was aware that R.K. used this fact to control D.P. and keep D.P. at the Rushing Lane property by threatening to turn D.P. into the police for using drugs if D.P. did not obey the family's orders. LAMBERT also was aware that R.K. and T.J.K. prevented D.P. from keeping possession of any state identification, money, or means of communication, so as to prevent D.P. from escaping their control or contacting law enforcement.

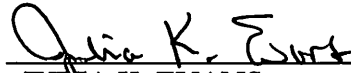
The family lived at the Rushing Lane property with D.P. from late August 2015 until June 30, 2016, when LAMBERT, R.K., T.J.K., J.L., and T.K. were arrested by local authorities. LAMBERT, R.K., T.J.K., J.L., and T.K. have all remained in custody since that date.

LAMBERT became addicted to methamphetamine at age 16, when her mother and stepfather (R.K. and T.J.K.) supplied the drug to her. LAMBERT purchased methamphetamine from R.K. LAMBERT remained addicted to and regularly used methamphetamine during the time the family lived at the Rushing Lane property, except for a brief period when she stopped using methamphetamine so she could breastfeed her newborn child. R.K. and T.J.K. used LAMBERT's addiction to methamphetamine to manipulate LAMBERT into following their orders, which included, among other things, to purchase ingredients used to make methamphetamine, and to verbally, physically, and psychologically abuse D.P.


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


BRIDGET LAMBERT
Defendant


9-27-18
(Date)


JULIA K. EVANS
Assistant United States Attorney

9-27-18
(Date)


DYLAN C. UTLEY
Counsel for Defendant

9/27/2018
(Date)


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9-27-18
(Date)