

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

* CRIMINAL NO. 22-48

v.

* SECTION: "I"

JEREMY TALBERT

*

a/k/a "J-Nasty"

*

a/k/a "Jay Nastie"

*

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


FACTUAL BASIS

The defendant, **JEREMY TALBERT a/k/a "J-Nasty" a/k/a "Jay Nastie"** (hereinafter, the "defendant" or "**TALBERT**"), has agreed to plead guilty as charged to Count 1 of the Bill of Information charging him with sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1594(a), and 2, in the Eastern District of Louisiana and elsewhere. Both the Government and the defendant, **JEREMY TALBERT**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty. 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 allegation in the Bill of Information now pending against the defendant:

Introduction

The Government would show that, at all times mentioned in the Bill of Information, **TALBERT** was an adult male who resided in the Memphis, Tennessee area.

The Government would show that, at all times mentioned in the Bill of Information [REDACTED] was an adult male who resided in the Memphis, Tennessee area.

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The Government would show that, at all times mentioned in the Bill of Information, [REDACTED] was an adult male who resided in the Memphis, Tennessee area.

The Government would show that, at all times mentioned in the Bill of Information, Minor Victim was a juvenile female who was born in about June 2006, and who resided in the Memphis, Tennessee area.

The Government would show that, at all times mentioned in the Bill of Information, Female 1 was a juvenile female who was born in about August 2003, and who resided in the Memphis, Tennessee area.

The Government would show that, at all times mentioned in the Bill of Information, Female 2 was an adult female who resided in the Memphis, Tennessee area.

Overview

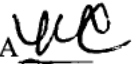
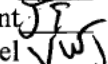
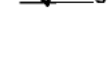
Prior to October 2020, **TALBERT** met Minor Victim on Facebook and recruited her to perform commercial sex acts at his direction despite knowing that Minor Victim was a minor. Shortly thereafter, **TALBERT** and Minor Victim met in person in the Memphis, TN area. From on or about October 11, 2020, through on or about October 21, 2020, and from on or about November 2, 2020, through on or about December 17, 2020, Minor Victim performed numerous commercial sex acts at **TALBERT'S** direction and supervision in locations including Jackson, Mississippi and New Orleans, Louisiana. Approximately six days per week during the aforementioned time periods, Minor Victim performed numerous commercial sex acts. During approximately this same time period, Female 1 performed commercial sex acts at the direction of [REDACTED], and Female 2 performed commercial sex acts at the direction of [REDACTED] **TALBERT**, [REDACTED], and [REDACTED]. sometimes stayed at the same hotels, traveled in the same vehicles, and/or coordinated their conduct with one another, including the recruitment, enticement, transportation, and direction

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of people to engage in commercial sex acts.

The Government would establish, through the introduction of documentary evidence and eyewitness testimony, that **TALBERT** directed and supervised Minor Victim when she worked performing commercial sex acts. For example, the Government would introduce eyewitness testimony and cellular phone records establishing that **TALBERT** instructed Minor Victim how much to charge for sexual acts. The Government would establish, through the introduction of eyewitness testimony and documentary evidence, that **TALBERT** required Minor Victim to turn over all, or most, of the money she earned from commercial sex acts to **TALBERT**. Phone records would further establish that **TALBERT** kept a tally of the amount of money that Minor Victim earned and required her to perform commercial sex acts until she earned approximately \$1,000 per day. Testimony and video recordings would show that **TALBERT** waited in a vehicle, sometimes with [REDACTED] and/or [REDACTED], and watched Minor Victim while she solicited "dates." Additionally, **TALBERT** purchased a cellular phone for Minor Victim and required Minor Victim to share the location information from her phone with **TALBERT**. While Minor Victim was working for **TALBERT** in New Orleans, **TALBERT** also provided Minor Victim with Trojan condoms to use during commercial sex, which were manufactured outside of the State of Louisiana.

The Government would introduce evidence that **TALBERT** knew that Minor Victim was a minor while Minor Victim was working for him. For example, the mother of Minor Victim would testify that she spoke on the phone with **TALBERT** and informed him that Minor Victim was fourteen years old. **TALBERT** falsely informed Minor Victim's mother that **TALBERT** would help locate Minor Victim and bring her home. The Government would also introduce documentary evidence that **TALBERT** had a copy of a Facebook post in which Minor Victim's

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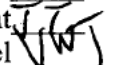
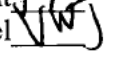
mother advertised that her fourteen-year-old daughter (Minor Victim) was missing. Additionally, **TALBERT** had sexual intercourse with Minor Victim on numerous occasions, and therefore had a reasonable opportunity to observe that she was a minor.

Interstate Travel

The Government would present testimonial evidence that, on or about October 11, 2020, **TALBERT** convinced Minor Victim to leave her family and go with him to make some money. **TALBERT** brought Minor Victim to a motel on Sycamore Drive in Memphis, Tennessee. After approximately two days, **TALBERT** drove Minor Victim from Memphis, Tennessee to Jackson, Mississippi, in a Nissan owned by **TALBERT**, for the purpose of having Minor Victim engage in commercial sex acts. [REDACTED] and Female 1 also travelled to Jackson, Mississippi in a separate vehicle. While in Jackson, Mississippi, Minor Victim performed commercial sex acts at the direction of **TALBERT**, and Female 1 performed commercial sex acts at the direction of [REDACTED].


Shortly thereafter, **TALBERT**, [REDACTED], Minor Victim, and Female 1 drove from Jackson, Mississippi to New Orleans, Louisiana, for the purpose of having Minor Victim and Female 1 engage in commercial sex acts. While in New Orleans, Louisiana, Minor Victim performed commercial sex acts at the direction of **TALBERT**, and Female 1 performed commercial sex acts at the direction of [REDACTED]. On or about October 21, 2020, **TALBERT**, [REDACTED], Minor Victim, and Female 1 returned to Memphis, Tennessee. Minor Victim returned home to her family.

On or about November 2, 2020, **TALBERT** brought Minor Victim from her home to **TALBERT**'s mother's home. The next morning, **TALBERT** purchased train tickets for Minor Victim and **TALBERT** to travel from Memphis to New Orleans for the purpose of having Minor Victim engage in commercial sex acts. In New Orleans, **TALBERT** and Minor Victim met up with [REDACTED] Female 1, [REDACTED], and Female 2. Minor Victim performed commercial sex acts at the


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photographs, online classified advertisements, and social media posts.

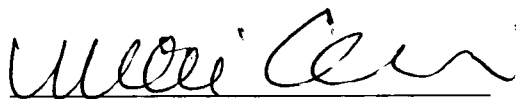
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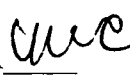
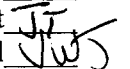
JEREMY TALBERT
Defendant



VALERIE JUSELIN
Counsel for Defendant



MARIA M. CARBONI
JORDAN GINSBERG
Assistant United States Attorneys

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Defendant 
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