

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

**UNITED STATES OF AMERICA**

**\* CRIMINAL DOCKET NO. 08-179**

**v.**

**\* SECTION: "C"**

**KWAME MICHOU NANTAMBU  
a/k/a Adonis Jefferson  
a/k/a Nantambu Willingham**

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**FACTUAL BASIS**

Should this matter have gone to trial, 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 indictment now pending against the defendant: The Defendant, **KWAME MICHOU NANTAMBU** (hereinafter "**NANTAMBU**") has agreed to plead guilty to Count One and Count Two of the superseding Bill of Information charging him with possession of a means of identification of another person, with unauthorized access device account number fraud from on or about May 20, 2007 until on or about May 21, 2008.

In particular, Count One charges the defendant with presenting a false means of identification at the airport to retrieve a reservation. The identification was a fake State of Georgia Driver's License in the name of Adonis Jefferson bearing number 063027041 which was all in violation of Title 18, United States Code, Section 1028(a)(7).

This fraudulent presentation at the airport was in connection with another unlawful activity that constitutes a violation of Federal law which is an attempted entry by false pretenses to any secure area of an airport in violation of 18 U.S.C. § 1036(a)(4).

In addition, the defendant **NANTAMBU**, has agreed to plead guilty to Count Two of the superseding Bill of Information charging him with unauthorized access device account number fraud from on or about May 20, 2007 until on or about May 21, 2008.

**COUNT ONE:**

Early on the morning of April 12, 2008, the Defendant called Jet Blue reservations and requested a reservation by pretending to be a Delta Airlines employee. This reservation was booked under the alias “Adonis Jefferson” and not the real name of the defendant Kwame Nantambu. The defendant admits he was not a Delta employee or an employee of any airline.

On April 17, 2008, in the Eastern District of Louisiana at New Orleans International Airport, the Defendant **NANTAMBU** presented a Georgia Driver’s license, bearing number 06302704, to a Jet Blue employee to retrieve his airline reservation and to comply with FAA regulations and Federal law by proving proof of identity.

The Defendant admits the fake Georgia Driver’s license was a means of identification and it was a fraudulent document, with corresponding authentication features, that purported to be a real identification issued by the State of Georgia. The fake driver’s license was issued under the Defendant’s alias “Adonis Jefferson” and was affixed with a real photograph of the Defendant and a nonexistent address in Atlanta, Georgia. The defendant used the identification because it allowed him to travel using various promotions designed for individuals under twenty five years of age. The identification indicated his date of birth was December 29, 1985.

After providing this fake driver's license and establishing his identity with the Jet Blue ticket agent, the Jet Blue employee proceeded to check one bag for the Defendant and to provide a boarding pass to the Defendant to proceed through the security checkpoint. The Jet Blue employee wasn't aware the identification was fraudulent or that the defendant used an alias to obtain and secure a reservation.

Prior to actually entering the security checkpoint, the Defendant was summoned back to the Jet Blue counter where he was asked to produce his Delta employee badge to verify his employee status to fly on the reservation. The Defendant failed to produce a Delta airline employee identification and was denied boarding. Eventually, his bag was returned to him after being retrieved from the baggage carousel but before it was loaded on the plane.

The defendant admits that he was not a Delta airline employee and that he used a falsely made driver's license to retrieve his airline reservation and to deceive an airline employee into believing he was Adonis Jefferson and furthermore he admits he used the identification in an attempt to enter a secure area of the airport in violation of Federal law by checking his bag and by obtaining a passenger boarding card that permitted him access to the secure area of the airport pending further inspection at the checkpoint.

The defendant further admits that his misconduct affected interstate commerce because his airline reservation/ticket was from the State of Louisiana to the State of New York thus travel within the Continental United States affects interstate commerce.

## **COUNT TWO:**

On or about May 20, 2007 until on or about May 21, 2008, in the Eastern District of Louisiana and elsewhere, defendant **KWAME MICHOU NANTAMBU; a/k/a Adonis Jefferson; a/k/a Nantambu Willingham;** knowingly and with intent to defraud used, and willfully cause the use of, unauthorized access device account numbers to obtain things of value aggregating \$1,000.00 or more during a one-year period, for a total of approximately \$13,713.10, thereby affecting interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(5).

Between May 20, 2007 and May 21, 2008, the Defendant traveled six times using tickets that were purchased using credit card account numbers not assigned to the defendant. The defendant contacted an individual who booked flights for the defendant at deeply discounted rates. The defendant acknowledges that he should have known based on the circumstances that the tickets were fraudulently obtained. These trips were international and domestic trips booked online and via the telephone with United Airlines and US Airways Incorporated. The Defendant traveled in his own name Kwame Nantambu on four occasions and under his alias Adonis Jefferson on two occasions. The Defendant knew that the tickets he was using during the following trips were not authorized and he did not have permission to fly on these credit card account numbers to purchase or cause anyone else to purchase these tickets on his behalf.

On May 20, 2007, the Defendant was issued a ticket and traveled from New York, New York to New Orleans, La. on airline ticket number 0372135994243. The fare was purchased under a Visa account number ending in xxxxxxxxxxxx2616. The fare for this ticket was \$253.30. The defendant admits that this ticket was purchased with a credit card account number that

belonged to an individual named L. J. The defendant admits he did not have authorization to fly on this account number and acknowledges that it was unlawful.

On September 19, 2007, the Defendant was issued a ticket and traveled from Atlanta, Georgia to New Orleans, La. on airline ticket number 03721461478453. The fare was purchased under a Discover account number ending in xxxxxxxxxxxx0827. The fare for this ticket was \$828.30. The defendant admits that is ticket was purchased with a credit card account number that belonged to an individual named J.T. The defendant admits he did not have authorization to fly on this account number and acknowledges that it was unlawful.

On December 17, 2007, the Defendant was issued a ticket and traveled from New York, New York to Dubai, United Arab Emirates on airline ticket number 0372152915733. The fare was purchased under Visa account number ending in xxxxxxxxxxxx6370. The fare for this ticket was \$4991.29. The defendant admits that is ticket was purchased with a credit card account number that belonged to an individual named L.S. The defendant admits he did not have authorization to fly on this account number and acknowledges that it was unlawful.

On January 7, 2008, the Defendant was issued a ticket and traveled from Dubai, United Arab Emirates to New Orleans, La. on airline ticket number 0372154276260. The fare was purchased under MasterCard account number ending in xxxxxxxxxxxx9991. The fare for this ticket was \$2059.26. The defendant admits that is ticket was purchased with a credit card account number that belonged to an individual named S.V. The defendant admits he did not have authorization to fly on this account number and acknowledges that it was unlawful.

On February 28, 2008, the Defendant was issued a ticket and traveled from Orlando, Florida to New Orleans, La. on airline ticket number 0372158450691. The fare was purchased under Visa account number ending in xxxxxxxxxxxx8362. The fare for this ticket was \$195.50.

The defendant admits that is ticket was purchased with a credit card account number that belonged to an individual named W. T. The defendant admits he did not have authorization to fly on this account number and acknowledges that it was unlawful.

On May 21, 2008, the Defendant was issued a ticket and traveled from New Orleans, La. To Dubai, United Arab Emirates on airline ticket number 0373311189948. The fare was purchased under Visa account number ending in xxxxxxxxxxx3918. The fare for this ticket was \$5385.45. The defendant admits that is ticket was purchased with a credit card account number that belonged to an individual named C.A. The defendant admits he did not have authorization to fly on this account number and acknowledges that it was unlawful.

The defendant further admits that this misconduct in Count Two affected interstate commerce because his airline trips were to and from the State of Louisiana, State of New York and other states. In addition, the Defendant traveled from overseas to and from the United States and vice versa thus travel within the Continental United States affects interstate commerce as well as Foreign commerce.

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W. SCOTT LARAGY  
Assistant United States Attorney  
LA Bar Roll No. 25755

Date

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KWAME M. NANTAMBU  
Defendant

Date

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GEORGE CHANEY  
Assistant Federal Public Defender  
Attorney for Defendant

Date