

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CR-20155-SEITZ(s)

UNITED STATES OF AMERICA

vs.

ROBERT DAVID CROIZAT,

Defendant.

FACTUAL PROFFER

The United States of America and ROBERT DAVID CROIZAT (“CROIZAT”) agree that, were this case to proceed to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Special Aircraft Jurisdiction of the United States:

On March 8, 2023, CROIZAT boarded American Airlines Flight 1192 from Barbados to Miami, Florida. During the flight, CROIZAT confronted a male flight attendant (“S.D.”) because he believed S.D. had been rude to him and to voice his displeasure that only vegetarian meal options were available in the first-class cabin. S.D. and another flight attendant (“K.H.”) instructed him to return to his seat. However, CROIZAT refused to obey the flight crew’s commands and became aggressive. CROIZAT loudly ordered the flight crew members to “get the Captain out here.” Flight attendants S.D. and K.H. again ordered CROIZAT to return to his seat; CROIZAT refused to comply. During the course of the heated exchange, CROIZAT assaulted victim flight attendant K.H. That is, he willfully and intentionally touched K.H. against his/her will without any justification or excuse.

The parties agree that these facts, which do not include all facts known to the government and the defendant, are sufficient to prove that CROIZAT assaulted K.H. within the Special Aircraft Jurisdiction of the United States, in violation of Title 18, United States Code, Section 113(a)(5) and Title 49, United States Code, Section 46506(1).

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date: _____

By: _____
STEPHEN J. DEMANOVICH
ASSISTANT UNITED STATES ATTORNEY

Date: _____

By: _____
BARRY WAX, ESQ
COUNSEL FOR THE DEFENDANT

Date: _____

By: _____
ROBERT DAVID CROIZAT
DEFENDANT