



Capital One Bank located in Edgard, Louisiana. Shortly thereafter, Beverly drove Jordan to the Capital One Bank, so Jordan could survey it and determine how many people were inside. While inside the bank, Jordan communicated to **RICHARDSON** via cellular telephone. **RICHARDSON** and Harris were sitting outside the bank in the Dodge Charger, while Beverly was outside in the Chevy Lumina. Once Jordan left the bank, Beverly drove Jordan back to his sister's house, where **RICHARDSON** and Harris met them. Jordan got out of Beverly's car and sat in the Dodge Charger once again. **RICHARDSON**, Harris and Jordan left for a short while to go to a nearby convenience store. While at the convenience store, **RICHARDSON** and Harris asked the clerk if the store carried bandanas. The store did not carry the type of bandanas **RICHARDSON** and Harris were looking for. **RICHARDSON**, Harris and Jordan returned to Beverly's sister's home.

Beverly and his sister left her house in Beverly's Chevy Lumina with the intent to start a fire to distract the police while **RICHARDSON** and Harris robbed the bank. During this time, **RICHARDSON**, Harris and Jordan drove to the Capital One Bank. **RICHARDSON** and Harris, with their faces covered, entered the bank, while Jordan remained in the backseat of the Dodge Charger. Both **RICHARDSON** and Harris were armed with handguns. Harris approached the assistant branch manager seated at her desk, pointed a firearm at her and ordered her to get up. Harris led the assistant branch manager to the area in front of the teller counter and ordered her to lie on the ground. **RICHARDSON**, who was carrying a black drawstring bag, jumped over the teller counter. **RICHARDSON** removed U.S. currency from the teller drawers and placed the currency in the bag. Harris then stated, "I'm going to take anyone that comes in the door, hurry up." A male

customer then entered the bank and Harris grabbed him and threw him to the ground. **RICHARDSON** then jumped back over the counter and both robbers exited the bank. **RICHARDSON** and Harris entered the Dodge Charger and left the bank premises. **RICHARDSON** was driving, while Harris was in the front passenger seat and Jordan was in the backseat.

A police vehicle immediately followed behind **RICHARDSON**, Harris and Jordan. Beverly, who was in his Chevy Lumina and remained in close proximity to the bank during the robbery, called **RICHARDSON** and informed him that they were being followed by police. **RICHARDSON** and Beverly tried to coordinate a place where Beverly could meet them. When another police car attempted to pass Beverly on the two-lane highway to catch up to the Dodge Charger, Beverly drove his Chevy Lumina slowly and in the middle of the street to slow the officer's progress. During the police chase, **RICHARDSON** crashed the Dodge Charger into the woods. **RICHARDSON**, Harris and Jordan all ran from the car into the woods. **RICHARDSON** called Beverly and told him the car had crashed and that they needed Beverly to pick them up. While **RICHARDSON** was hiding in the woods, several calls were exchanged between **RICHARDSON** and Beverly. **RICHARDSON** also sent several text messages to Jordan while in the woods. Beverly drove around the area of the woods where **RICHARDSON**, Harris and Jordan were, but was unable to locate anyone before his arrest.

An audit conducted after the robbery revealed that approximately \$21,649.00 U.S. currency of bank funds were taken by **RICHARDSON** and Harris from the Capital One Bank. On May 4, 2010, the Capital One Bank located at 2447 Highway 18, Edgard, Louisiana, had its deposits insured by the Federal Deposit Insurance Corporation.

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ELIZABETH PRIVITERA, #27042 (Date)  
Assistant United States Attorney

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GEORGE CHANEY (Date)  
Attorney for Defendant

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COREY RICHARDSON (Date)  
Defendant



Capital One Bank, so she could survey it and determine how many people were inside. While inside the bank, **JORDAN** communicated to Richardson via cellular telephone. Richardson and Harris were sitting outside the bank in the Dodge Charger, while Beverly was outside in the Chevy Lumina. Once **JORDAN** left the bank, Beverly drove **JORDAN** back to his sister's house, where Richardson and Harris met them. **JORDAN** got out of Beverly's car and sat in the Dodge Charger once again. Richardson, Harris and **JORDAN** left for a short while to go to a nearby store. Richardson, Harris and **JORDAN** returned to Beverly's sister's home.

Beverly and his sister left her house in Beverly's Chevy Lumina with the intent to start a fire to distract the police while Richardson and Harris robbed the bank. During this time, Richardson, Harris and **JORDAN** drove to the Capital One Bank. Richardson and Harris, with their faces covered, entered the bank, while **JORDAN** remained in the backseat of the Dodge Charger. Both Richardson and Harris were armed with handguns. Harris approached the assistant branch manager seated at her desk, pointed a firearm at her and ordered her to get up. Harris led the assistant branch manager to the area in front of the teller counter and ordered her to lie on the ground. Richardson, who was carrying a black drawstring bag, jumped over the teller counter. Richardson removed U.S. currency from the teller drawers and placed the currency in the bag. Harris then stated, "I'm going to take anyone that comes in the door, hurry up." A male customer then entered the bank and Harris grabbed him and threw him to the ground. Richardson then jumped back over the counter and both robbers exited the bank. Richardson and Harris entered the Dodge Charger and left the bank premises. Richardson was driving, while Harris was in the front passenger seat and **JORDAN** was in the backseat.

A police vehicle immediately followed behind Richardson, Harris and **JORDAN**. Beverly, who was in his Chevy Lumina and remained in close proximity to the bank during the robbery, called Richardson and informed him that they were being followed by police. Richardson and Beverly tried to coordinate a place where Beverly could meet them. When another police car attempted to pass Beverly on the two-lane highway to catch up to the Dodge Charger, Beverly drove his Chevy Lumina slowly and in the middle of the street to slow the officer's progress. During the police chase, Richardson crashed the Dodge Charger into the woods. Richardson, Harris and **JORDAN** all ran from the car into the woods. Richardson called Beverly and told him the car had crashed and that they needed Beverly to pick them up. While Richardson was hiding in the woods, several calls were exchanged between Richardson and Beverly. Beverly drove around the area of the woods where Richardson, Harris and **JORDAN** were, but was unable to locate anyone before his arrest. **JORDAN** was arrested running out of the woods, which was inside the law enforcement perimeter.

An audit conducted after the robbery determined that approximately \$21,649.00 U.S. currency of bank funds were taken by Richardson and Harris from the Capital One Bank. On May 4, 2010, the Capital One Bank located at 2447 Highway 18, Edgard, Louisiana, had its deposits insured by the Federal Deposit Insurance Corporation.

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ELIZABETH PRIVITERA, #27042 (Date)  
Assistant United States Attorney

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ARTHUR LEMANN (Date)  
Attorney for Defendant

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DORIYAH JORDAN (Date)  
Defendant

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

**UNITED STATES OF AMERICA**

**v.**

**VINCENT BEVERLY**

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**CRIMINAL DOCKET NO. 10-175**

**SECTION: "J"**

**FACTUAL BASIS**

The above-named defendant **VINCENT BEVERLY** has agreed to plead guilty as charged to Count 1 of the Indictment in this case. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts to support the allegations against the defendant, **VINCENT BEVERLY ("BEVERLY")**:

The morning of May 4, 2010, **BEVERLY** drove to his sister's house in Edgard, Louisiana, in his Chevy Lumina, while his co-conspirators, Corey Richardson, Errol Harris and Doriyah Jordan followed him in a Dodge Charger. When they arrived at **BEVERLY'S** sister's house, Richardson, **BEVERLY** and others, had a discussion about robbing the Capital One Bank located in Edgard, Louisiana. Shortly thereafter, **BEVERLY** drove Jordan to the Capital One Bank, so she could

survey it and determine how many people were inside. While inside the bank, Jordan communicated to Richardson via cellular telephone. Richardson and Harris were sitting outside the bank in the Dodge Charger. Once Jordan left the bank, **BEVERLY** drove Jordan back to his sister's house, where Richardson and Harris met them. Jordan got out of **BEVERLY'S** car and sat in the Dodge Charger once again. Richardson, Harris and Jordan left for a short while to go to a nearby store. Richardson, Harris and Jordan returned to **BEVERLY'S** sister's home.

During this time, Richardson, Harris and Jordan drove to the Capital One Bank. Richardson and Harris, with their faces covered, entered the bank, while Jordan remained in the backseat of the Dodge Charger. Both Richardson and Harris were armed with handguns. Harris approached the assistant branch manager seated at her desk, pointed a firearm at her and ordered her to get up. Harris led the assistant branch manager to the area in front of the teller counter and ordered her to lay on the ground. Richardson, who was carrying a black drawstring bag, jumped over the teller counter. Richardson removed U.S. currency from the teller drawers and placed the currency in the bag. Harris then stated, "I'm going to take anyone that comes in the door, hurry up." A male customer then entered the bank and Harris grabbed him and threw him to the ground. Richardson then jumped back over the counter and both robbers exited the bank. Richardson and Harris entered the Dodge Charger and left the bank premises. Richardson was driving, while Harris was in the front passenger seat and Jordan was in the backseat.

A police vehicle immediately followed behind Richardson, Harris and Jordan. **BEVERLY**, who remained in close proximity to the bank during the robbery, called Richardson and informed him that they were being followed by police. Richardson and **BEVERLY** tried to coordinate a place

where **BEVERLY** could meet them. When another police car attempted to pass **BEVERLY** on the two-lane highway to catch up to the Dodge Charger, **BEVERLY** drove his Chevy Lumina in a manner specifically designed to slow the officer's progress. During the police chase, Richardson crashed the Dodge Charger into the woods. Richardson, Harris and Jordan all ran from the car into the woods. Richardson called **BEVERLY** and told him the car had crashed and that they needed **BEVERLY** to pick them up. While Richardson was hiding in the woods, several calls were exchanged between Richardson and **BEVERLY**. **BEVERLY** drove around the area of the woods where Richardson, Harris and Jordan were, but was unable to locate anyone before his arrest.

An audit conducted after the robbery determined that approximately \$21,649.00 U.S. currency of bank funds were taken by Richardson and Harris from the Capital One Bank. On May 4, 2010, the Capital One Bank located at 2447 Highway 18, Edgard, Louisiana, had its deposits insured by the Federal Deposit Insurance Corporation.

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ELIZABETH PRIVITERA, #27042 (Date)  
Assistant United States Attorney

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FRANK SLOAN (Date)  
Attorney for Defendant

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VINCENT BEVERLY (Date)  
Defendant