

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

* CRIMINAL NO. 18-13

v.

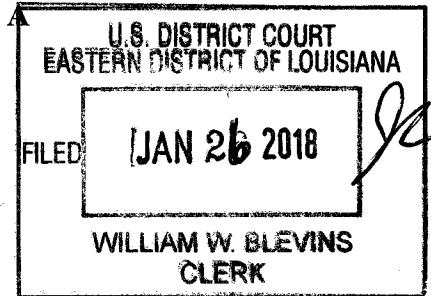
* SECTION: A

ZOE WILLIAMS

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FACTUAL BASIS



The above-named defendant, **ZOE WILLIAMS**, has agreed to plead guilty as charged to Count One of the Bill of Information, which charges that **ZOE WILLIAMS** committed Conspiracy to Commit Bank Robbery with a Firearm, in violation of Title 18, United States Code, Sections 371 and 2113(a) and (d).

The Conspiracy to Commit Robbery of the Chase Bank at 3231 Gentilly Boulevard

In 2014, **Zoe WILLIAMS** was a twenty-two year old college graduate employed as a teller at the Chase Bank drive-through location in the Gentilly neighborhood of New Orleans, Louisiana, in the Eastern District of Louisiana. The bank's physical address was 3231 Gentilly Boulevard, and it was located near the intersection of Elysian Fields Avenue and Gentilly Boulevard. The bank and its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

Zoe WILLIAMS began dating a man names Casey JOHNSON in the fall of 2014. Casey JOHNSON and his friend Jay LYONS were in a band together known as "TruceMob." **WILLIAMS** also knew LYONS from elementary school. **Zoe WILLIAMS** also met Walter JOHNSON, Casey's brother.

In December of 2014, LYONS, Casey JOHNSON, Walter JOHNSON were discussing possible ways of making money involving fraudulent checks and ATM machines. Eventually,

LYONS decided that they should rob the bank where **WILLIAMS** was working. **WILLIAMS** agreed to give Casey JOHNSON, Jay LYONS and Walter JOHNSON information on how to rob the bank. In the days before the robbery, **Zoe WILLIAMS** met with Casey JOHNSON, Walter JOHNSON, and Jay LYONS at Casey JOHNSON's mother's house. At that meeting, **Zoe WILLIAMS** provided her co-conspirators with specific information about the bank, including: what time **Zoe WILLIAMS** arrived at work, how many people worked inside of the bank, what time the bank opens, and the procedure for opening the vault.

The day before the robbery, **Zoe WILLIAMS** met with Casey JOHNSON, Walter JOHNSON, and Jay LYONS to do a run-through of the robbery. **Zoe WILLIAMS** understood that she would be the first employee at the bank on the morning of Saturday, December 20, 2014, and that she would let the other teller into the bank, and that as the other teller entered the bank, her co-conspirators would rush into the bank through the open door. **Zoe WILLIAMS** understood that Casey JOHNSON would be the driver, and Walter JOHNSON and Jay LYONS would come inside the bank, and that they would be armed with guns. The other teller had no knowledge of the robbery before it happened, and was not a co-conspirator.

On the morning of the robbery, **Zoe WILLIAMS** arrived at the bank, but hesitated to go into the building, and the other teller entered the bank first. The other teller opened the door for **Zoe WILLIAMS** to enter, and that is when Jay LYONS and Walter JOHNSON entered the bank behind **Zoe WILLIAMS** before the door shut completely. Both Walter JOHNSON and Jay LYONS had their faces obscured, were armed with firearms, and pointed the guns at **Zoe WILLIAMS** and her co-worker. Walter JOHNSON and Jay LYONS began giving the tellers instructions, like "hurry up," "get on the ground," "close the blinds," "open the vault," and "make sure there are no alarms on."

One of the robbers told the tellers that he previously worked at a bank, and that he knew about the alarms.

At the instruction of the robbers, **Zoe WILLIAMS** and her colleague opened the vault by using a key and also entering a code. LYONS and Walter JOHNSON then took approximately \$167,700 from the vault and approximately \$29,015 from the cash drawer, which they put into a black back pack. After retrieving the money, LYONS and Walter JOHNSON fled north-west through the bank parking lot on foot, and entered Casey JOHNSON's waiting Toyota Camry.

Casey JOHNSON called **Zoe WILLIAMS** on the night of the robbery, and told her that he was in Houston. **Zoe WILLIAMS** saw Casey JOHNSON four days later on Christmas Eve at Casey's father's house in Chalmette, La. Casey JOHNSON was nervous, and told **Zoe WILLIAMS** that he was worried that he and his vehicle may be on surveillance cameras from a gas station adjacent to the bank. Casey JOHNSON was also worried that a woman at the Capitol One bank across the street had also seen him and his vehicle during the robbery. During this meeting, Casey JOHNSON advised that he had disposed of his black 2004 Toyota Camry following the robbery. Casey JOHNSON advised that he, Walter JOHNSON, and Jay LYONS had gone to Houston the day of the robbery, and were now going to Atlanta, in an effort to avoid apprehension. Casey JOHNSON was also in possession of a large amount of cash that was wrapped in rubber bands during this meeting. Based on conversations with Casey JOHNSON, Walter JOHNSON, and Jay LYONS, **Zoe WILLIAMS** believes that her co-conspirators spent the money on drugs, strippers, hotels, rental cars, and music videos.

This proffer of evidence is not intended to constitute a complete statement of all facts known by **Zoe WILLIAMS** and described by **Zoe WILLIAMS** to the Government, but rather is a minimum

statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for **Zoe WILLIAMS'** plea of guilty to the crime of Conspiracy to Commit Bank Robbery with a Firearm.

READ AND APPROVED:



CLAUDE KELLY [date]
Counsel for **Zoe WILLIAMS**



MYLES RANIER [date]
Assistant United States Attorney



Zoe WILLIAMS [date]
Defendant