

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

*

CRIMINAL NO. 14-34

v.

*

SECTION: "A"

LARRY WILLIAMS

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FACTUAL BASIS

Should this matter have gone to trial, the government would have proved through the introduction of competent testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in the indictment now pending against the defendant, **LARRY WILLIAMS** (hereinafter "**WILLIAMS**"). (Unless otherwise noted, the acts and events listed herein occurred in the Eastern District of Louisiana.)

On Tuesday, April 30th, 2012, **WILLIAMS**, wearing a yellow safety vest, a black long-sleeved t-shirt, a khaki boonie hat, and sunglasses, entered the J.P. Morgan Chase Bank branch located at 201 St. Charles Avenue. **WILLIAMS** waited in line until the customers in front of him had been helped and then walked to one of the tellers. Believing him to be a customer, she advised **WILLIAMS** that she could help him.

When **WILLIAMS** walked up to the teller's counter, he handed her a demand note that read, "I HAVE A GUN DON'T MOVE GIVE ME ALL THE FUCKING MONEY BITCH." The teller dropped the note and activated a silent alarm while opening a money drawer. She removed a bundle of currency—containing a dye pack—from the drawer and placed it on the counter. **WILLIAMS** asked if that was it and the teller replied yes. Robber put the money in a white plastic

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grocery bag with black writing and then exited the bank on St Charles Avenue and took a right on Gravier Street. The total of the money that **WILLIAMS** took from the Chase Bank was six thousand five hundred thirty-one dollars (\$6,531).

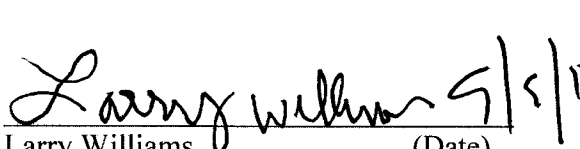
As **WILLIAMS** walked down Gravier Street, the dye pack exploded. **WILLIAMS** ran a short distance while trailing red dye, and ultimately discarded the plastic bag with red dye-stained money on the sidewalk on Gravier Street. He walked into one of the loading docks on the Gravier Street side of Place St. Charles and then, in a secluded corner, took off some of his outer clothing. The discarded clothing included the khaki boonie hat, yellow safety vest, black long-sleeve t-shirt, bandana, pants, tennis shoes, and a tote bag.

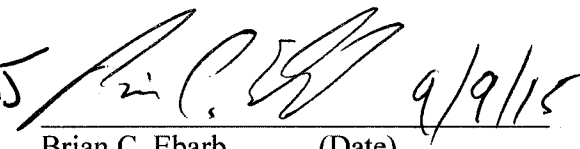
All of the clothing was visible on the robber in the surveillance video from the bank and outside of Place St. Charles. All of the events set forth above were captured on a variety of surveillance cameras.

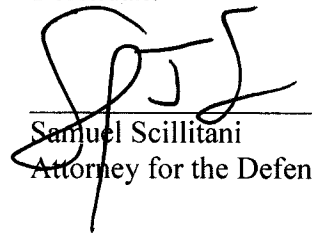
The discarded clothing was tested by the FBI DNA lab, which resulted in a CODIS hit on **LARRY WILLIAMS**. Confirmation swabs were later acquired from **WILLIAMS** and compared against the DNA recovered from the discarded clothing, resulting in a positive match.

LIMITED NATURE OF FACTUAL BASIS

This proffer of evidence is not intended to constitute a complete statement of all facts known by **LARRY WILLIAMS** and 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 basis for **LARRY WILLIAMS'** plea of guilty to the charged offenses.

 9/9/15
Larry Williams (Date)
Defendant

 9/9/15
Brian C. Ebarb (Date)
Special Assistant United States Attorney

 9/9/15
Samuel Scillitani (Date)
Attorney for the Defendant