

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

UNITED STATES OF AMERICA * **CRIMINAL NO. 18-082**
v. * **SECTION: "H"**
STEPHEN J. SCOTT *
* * *

FACTUAL BASIS

The above-named defendant, **STEPHEN J. SCOTT**, ("SCOTT") has agreed to plead guilty as charged to Count One of the Indictment. Had this matter proceeded to trial, the government would have proven beyond a reasonable doubt the allegation of Count One of the Indictment, namely that **SCOTT** committed bank robbery as that crime is defined in Title 18, United States Code, Section 2113(a).

Facts

On Monday, April 9, 2018, at approximately 3:44 p.m., the Jefferson Parish Sheriff's Office was dispatched to the First American Bank & Trust, 1800 Veterans Memorial Boulevard, Metairie, Louisiana, in the Eastern District of Louisiana, in reference to a robbery that had just occurred. The victim teller stated that she had just been robbed, and provided the following information. At approximately 3:40 p.m., the victim teller was working as a bank teller when she observed a then-unknown white male, later identified as **SCOTT**, enter the bank through the front entry/exit doors. **SCOTT** approached the victim teller, retrieved a note from his wallet and slid it across the teller counter. The victim teller looked at the note and read the following, "This is a bank robbery, no small bills, no dye packs." The victim teller provided that the note may have said more but she stopped reading after the first line. **SCOTT** said "hurry up, hurry up," as the teller

AUSA MP
Defendant SS
Defense Counsel GVSP

hesitated. The victim teller observed **SCOTT** point his index finger like a gun at the victim teller, and then look down at his waistband. However, the victim advised that she never saw a weapon of any kind. The victim teller opened her cash drawer and relinquished one (1) pack of \$100 bills and an unknown amount of \$20 bills. It was later learned, after her register was balanced, that the total loss was \$3,400. The funds taken by **SCOTT** during the robbery were in the possession of the First American Bank & Trust, and are secured through the Federal Deposit Insurance Corporation.

Additional members of the Jefferson Parish Sheriff's Office Robbery Division and the FBI's Violent Crimes Task Force also responded and began to interview other bank employees, who were in the bank during the robbery and witnessed the suspect entering/exiting the business. The other bank employees corroborated the robbery described by the victim teller.

The victim teller described **SCOTT** as a white male with a bald head and reddish beard, who was clad in a grey t-shirt with long white sleeves and blue jeans, with no gloves nor was his face concealed. He was approximately 5 foot 10 inches to 6 feet tall, weighing approximately 175 to 180 pounds, approximately 30 to 40 years old and was described as having a possible tattoo on his neck. Other employees provided a similar description of **SCOTT** and observed him running south bound on Bonnabel Boulevard, where they lost sight of him by the rear fence of the business.

Law enforcement reviewed surveillance footage of the robbery, which was of high quality and clearly depicted the suspect. A review of the surveillance footage showed **SCOTT** approach the teller and lean over the counter towards the teller, and that **SCOTT** used intimidating body posture and facial expressions during the robbery. Further, the surveillance revealed that the suspect touched several surfaces with his ungloved hand. JPSO crime scene technicians recovered

these prints, and provided them to the JPSO crime lab for analysis. A latent print obtained from the interior of the gold plate of the bank's left outer door, was searched through the Automated Fingerprint Identification System (AFIS). A comparison of the respondent list from AFIS to the latent print resulted in the identification of the right hypothenar palm region of **STEPHEN J. SCOTT**, white male, with date of birth **/**/1987.

These results were forwarded to the JPSO Robbery Section and the FBI Violent Crimes Task Force. Research was conducted in databases available to law enforcement and it was obvious upon viewing a booking photograph of the defendant **STEPHEN J. SCOTT** compared to the suspect in the surveillance footage that they were the same person. Agents were able to review a social media account labelled "Stephen Scott" and were able to match photos on the account to the photo associated with **SCOTT** in a law enforcement database.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by the government and/or **STEPHEN J. SCOTT**, and it is not a complete statement of all facts described by **SCOTT** to the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **STEPHEN J. SCOTT**.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, members of the Jefferson Parish Sheriff's Office, and Special Agents and forensic examiners from the Federal Bureau of Investigation, and admissible, tangible exhibits in the custody of the FBI.



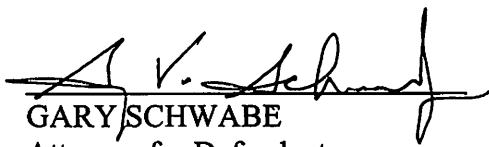
MYLES D. RANIER
Assistant United States Attorney

11/2/18
Date



STEPHEN J. SCOTT
Defendant

11/1/18
Date



GARY SCHWABE
Attorney for Defendant

11-1-18
Date