

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

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 17-220

v.

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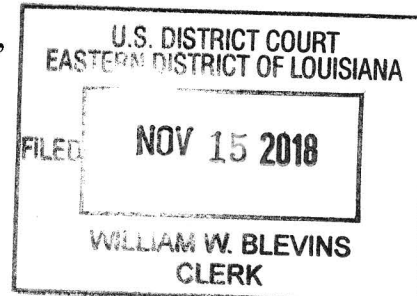
SECTION: "G"

JONATHAN BAHAM

\*

\* \* \*

**FACTUAL BASIS**



The above-named defendant, JONATHAN BAHAM, has agreed to plead guilty as charged to Count 5 of the Indictment, which charges that JONATHAN BAHAM violated Title 18, United States Code, Sections 371 and 2113(a) and (d), in that he conspired to rob with a firearm the Whitney Bank at 1324 South Carrollton Avenue in New Orleans, Louisiana, an institution located in the Eastern District of Louisiana and insured by the Federal Deposit Insurance Corporation.

**Conspiracy to Rob with a Firearm the Whitney Bank at 1324 South Carrollton  
Avenue, New Orleans, Louisiana**

JONATHAN BAHAM was friends with Samuel TAYLOR and Arlander CELIUS and knew them from associating together on the Westbank of Jefferson Parish. On or about September 25, 2017, Jonathan BAHAM, Samuel TAYLOR, and Arlander CELIUS agreed to rob the Whitney Bank at 1324 South Carrollton Avenue. BAHAM knew that robbing the bank was illegal, and joined in the conspiracy willfully.

On September 25, 2017, BAHAM accompanied TAYLOR and CELIUS to "case" the bank, which meant observing it in preparation for the future robbery. On that date, CELIUS entered the bank, and pretended to be a potential customer, as he familiarized himself with the layout of the bank. CELIUS left the bank and reported his observations about the layout and

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Doc. No. \_\_\_\_\_

AUSA MR  
Defendant SJB  
Defense Counsel STJ

security features of the bank to BAHAM and TAYLOR. On that date, a bank associate observed CELIUS, BAHAM, and TAYLOR all monitoring the bank, and the associate reported this suspicious behavior to the bank security guard.

On the morning of Wednesday, September 27, 2017, members of the New Orleans Police Department responded to a complaint of an active burglary occurring at 8337 Cohn Street in New Orleans, Louisiana. Police entered the residence, and discovered BAHAM, TAYLOR, and CELIUS inside of the residence. None of the men had permission to be in the house, and had broken into the residence. Law enforcement officers also located a loaded Harrington and Richardson "Pardner" Pump 12 gauge shotgun and a Taurus .38 caliber revolver handgun in the residence. If called to testify, a firearms expert with the Bureau of Alcohol, Tobacco, Firearms, and Explosives would state that both guns were manufactured outside of the state of Louisiana and travelled in interstate commerce to arrive in New Orleans, Louisiana. BAHAM, TAYLOR, and CELIUS were attired in dark clothing and were in possession of three homemade ski masks.

Following a lawful arrest, BAHAM was advised of his Miranda rights, and knowingly and intentionally waived these rights and agreed to speak to law enforcement. BAHAM admitted to law enforcement that he had agreed to rob the Whitney Bank with a firearm with TAYLOR and CELIUS. All three co-conspirators planned the robbery together, and made the home-made ski masks in anticipation of the robbery. BAHAM specifically admitted that he agreed to serve as a lookout during the robbery, and that the three were about to leave the burglarized residence to go rob the bank when the police arrived and detained them.

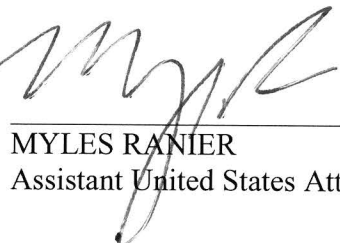
**Limited Nature of Factual Basis**

This proffer of evidence is not intended to constitute a complete statement of all facts known by the government and/or JONATHAN BAHAM, and it is not a complete statement of all facts described by JONATHAN BAHAM 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 JONATHAN BAHAM.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from members of the New Orleans Police Department and Special Agents and forensic examiners from the Federal Bureau of Investigation, and admissible, tangible exhibits in the custody of the FBI.

**READ AND APPROVED:**

  
\_\_\_\_\_  
SAMUEL SCILLITANI  
Counsel for JONATHAN BAHAM  
11/15/18 [date]

  
\_\_\_\_\_  
MYLES RANIER  
Assistant United States Attorney  
11/15/18 [date]

  
\_\_\_\_\_  
JONATHAN BAHAM  
Defendant  
11/15/18 [date]