



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

* CRIMINAL NO. 17-172

v.

* SECTION: "M"

AARON RUDOLPH

* VIOLATION: 18 U.S.C. § 371

* * *

FACTUAL BASIS

If this matter had proceeded to trial, the United States would have proved through the introduction of competent testimony and admissible evidence, the facts below to support the allegation charged by the Government in Count One of the Indictment now pending in the above-captioned case, which charges **AARON RUDOLPH** with conspiracy to commit bank robbery, in violation of violation of Title 18, United States Code, Section 371.

On August 15, 2017 at approximately 11:17 a.m., **AARON RUDOLPH** and **JOHN RUDOLPH** walked into the First Bank and Trust, located at 1320 South Morrison Boulevard in Hammond, Louisiana ("the First Bank and Trust"). **AARON RUDOLPH** was wearing a dark-colored shirt, gray sweatpants, and a dark-colored hat with the words "CAT" in light-colored text on the front. **JOHN RUDOLPH** was wearing jeans, a dark-colored shirt with white stripes, and a white hat. **JOHN RUDOLPH** asked teller B.S. where the restroom was, and then walked towards the bathroom area. **AARON RUDOLPH** asked B.S. about opening an account. B.S. told **AARON RUDOLPH** to wait for another employee in the waiting area.

Shortly thereafter, **JOHN RUDOLPH** returned from the restroom area, and approached B.S.'s teller counter. **JOHN RUDOLPH** placed a firearm on the counter and demanded all of the money from the drawer. **AARON RUDOLPH** then joined **JOHN RUDOLPH** at the teller

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counter. B.S. provided \$10,490.96 from the drawer and dye packs to **AARON RUDOLPH** and **JOHN RUDOLPH**. Both men instructed B.S. not to press the alarm button. B.S. was also advised to go to the bathroom and lock the door, which she did. Bank surveillance footage captured the above-described events.

After the robbery, **AARON RUDOLPH** and **JOHN RUDOLPH** exited the bank on foot. Two witnesses who were in the bank drive-through observed the suspects running west, and observed a pink puff of smoke coming from the male wearing the blue striped shirt. A Hammond Police Department Detective watched surveillance footage from a nearby Social Security Office, and observed the perpetrators entering a light colored vehicle parked at the corner of Robin Ave and Derek Drive at the business of the Hammond Eye Clinic. A detective also observed pink paint consistent with ink from a bank dye pack on the ground where the vehicle was parked.

At the time of this robbery, **AARON RUDOLPH** was dating K.M. Both lived in New Orleans, Louisiana. A silver four-door Hyundai vehicle bearing Louisiana license plate 321 ALU was registered to K.M. ("K.M.'s vehicle"). On August 15, 2017, K.M.'s vehicle was captured on cameras in the vicinity of the First Bank and Trust at approximately 11:34 a.m. Records from Touro Hospital indicate that K.M. was in the hospital during that time.

After robbing the First Bank and Trust, **AARON RUDOLPH** and **JOHN RUDOLPH** called K.M. and stated that they had just robbed a bank in Hammond and a dye pack blew up. **AARON RUDOLPH** and **JOHN RUDOLPH** then picked up K.M. from the hospital and went to a hotel. Inside the hotel, **AARON RUDOLPH** and **JOHN RUDOLPH** displayed dye-stained money and discussed how to clean it.

On or about September 7, 2017, Special Agents with the Federal Bureau of Investigation ("FBI") arrested **AARON RUDOLPH** at the home of C.W. and M.W. While agents were

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speaking with C.W. and M.W., they observed **AARON RUDOLPH** moving around in a living room area. On the ground near **AARON RUDOLPH**, agents discovered approximately \$2,000 in United States currency. C.W. and M.W. disclaimed ownership over the money.

On or about September 11, 2017, FBI Special Agents secured a search warrant for a Nissan Altima that had been rented by **AARON RUDOLPH** on or about August 18, 2017. When agents executed this warrant, they located a key fob for K.M.'s vehicle and a pair of gray sweatpants that have a consistent appearance to the pants worn by **AARON RUDOLPH** during the robbery of the First Bank and Trust.

On or about September 27, 2018, **AARON RUDOLPH** pleaded guilty to Armed Robbery in state court in Mississippi for a robbery of the First Bank in Long Beach, Mississippi, which occurred on or about August 16, 2017. K.M. pleaded guilty in Mississippi to being an Accessory After the Fact to this robbery. During this robbery in Mississippi—which occurred one day after the robbery of the First Bank and Trust in Hammond—**AARON RUDOLPH** wore a dark-colored hat with the words “CAT” in light-colored text on the front, and used a silver four-door Hyundai vehicle.

At all material times herein, the First Bank and Trust was a financial institution with deposits insured by the Federal Deposit Insurance Corporation and was located in the Eastern District of Louisiana.

By way of this factual basis, **AARON RUDOLPH** admits that he did knowingly combine, conspire, confederate and agree with **JOHN RUDOLPH**, to rob the First Bank and Trust, located at 1320 South Morrison Boulevard in Hammond, Louisiana on or about August 15, 2017.

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This proffer of evidence is not intended to constitute a complete statement of all facts known 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 factual and legal basis for AARON RUDOLPH's plea of guilty to Count One of the Indictment now pending in the above-captioned case.

Maria M. Carboni
MARIA M. CARBONI
Assistant United States Attorney

4/18/19
Date

M. Boleware
MICHAEL BOLEWARE
Counsel for the defendant

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A. Rudolph
AARON RUDOLPH
Defendant

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Date