

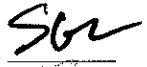
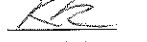
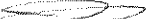
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 18-260
v.	*	SECTION: "E"
KEITH ANTHONY RAMIREZ	*	VIOLATIONS: 18 U.S.C. § 2113(a)
	*	
	*	
	*	

FACTUAL BASIS

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

On Tuesday, December 4, 2018, at approximately 9:45 a.m., the Capital One Bank located at 830 North Highway 190, Covington, Louisiana 70433 was robbed by a white male. Members of the FBI, St. Tammany Sheriff's Office, and Covington Police Department responded to the location and interviewed bank employees and other witnesses. Agents interviewed the victim teller ("Victim-1"). According to the Victim-1, the white male approached Victim-1 at the teller counter and presented a note demanding money. Victim-1 gave the white male approximately \$660 in U.S. Currency from Victim-1's cash drawer. The unknown white male then exited the

AUSA   
Defendant   
Defense Counsel 

bank through the front door. The funds taken by the unknown white male, who was later identified as **RAMIREZ**, belonged to Capital One Bank. Those funds were insured by the Federal Deposit Insurance Corporation, and Capital One Bank was located in the Eastern District of Louisiana.

Victim-1 described the robber as a white male, approximately 5'8" to 6'0" in height, with a medium build, approximately mid-thirties in age, and wearing a gray hooded sweatshirt bearing the "Broncos" name across the front, a dark knit cap, blue jeans, and tennis shoes. Agents reviewed bank surveillance video which corroborated Victim-1's description of the event and description of the robber. The surveillance video also revealed that the robber fled in a silver colored Honda Accord, four door, with black rims. The agents were not able to make out the license plate from this surveillance footage.

Shortly after they reviewed the bank's surveillance video, the agents were told by police officers who were also working the case that their department had received a call earlier that morning from a concerned citizen ("Witness-1") about a white male driving erratically in front of the Lowe's hardware store in Covington. The agents then met with Witness-1 to determine if the person she witnessed driving erratically was the same person that robbed the Capital One Bank. Witness-1 showed the agents video footage that she had taken with her cell phone of the white male she witnessed driving in an unsafe manner. The video footage showed the white male matching the description of the bank robber drive a silver Honda Accord into the parking lot of the Lowe's hardware store. The agents were able to read the license plate number of the silver Honda from the video. The agents then ran the license plate number through various databases and discovered that the silver Honda was registered to **RAMIREZ** of Airline Park Boulevard,

Metairie, Louisiana. According to **RAMIREZ'S** driver's license, he was 5'11", and weighs 175 lbs. This height/weight matched the description given by Victim-1 and as observed on the bank surveillance video.

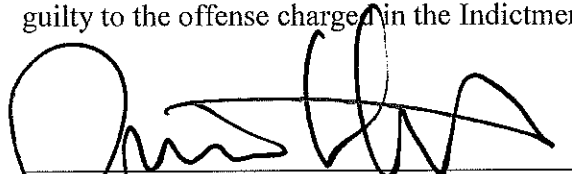
The agents then went to the Lowe's store to determine if their security cameras had captured video of **RAMIREZ** walking around their facility. The surveillance video showed **RAMIREZ**, who was wearing the same clothes he wore during the bank robbery, exit the silver Honda and enter the store. The agents then put out an alert to surrounding agencies for the silver Honda. At approximately 2:15 p.m., **RAMIREZ** was stopped by members of the Covington Police Department while driving the silver Honda in the vicinity of Collins Road and Highway 190. After they got **RAMIREZ** out of the car, the officers patted him down and found several hundred dollars in his pants pockets. **RAMIREZ** then gave the officers consent to a search his car. The officers searched the car and found more currency in the front passenger area of the car. The officer recovered \$668 in total from **RAMIREZ'S** person and vehicle. Following the search, **RAMIREZ** was taken into custody and transported to the St. Tammany Sheriff's Office Criminal Investigative Department (CID) to be interviewed.

During the interview, a special agent with the FBI asked **RAMIREZ** where he obtained the money that was found in his pockets and vehicle. **RAMIREZ** said the \$600 they recovered came from his paycheck that he recently cashed. When asked what bank he used to cash his check, **RAMIREZ** told the agents that he could not recall where he cashed the check. The FBI agent then told **RAMIREZ** that they were going to search his car after the interview, and **RAMIREZ** responded that they would not find any clothes in the car. The FBI agent then noticed that the shoes **RAMIREZ** was wearing matched the shoes worn by the suspect in the video

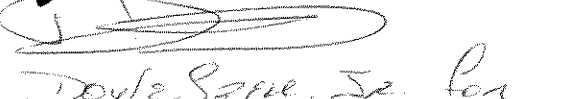
surveillance footage from Capital One Bank.

Later that afternoon, the FBI agent interviewed an acquaintance of **RAMIREZ**, who know knew **RAMIREZ** very well. The acquaintance reviewed the still photos from the bank and positively identified **RAMIREZ** as the suspect. The acquaintance also told that agents that he had seen **RAMIREZ** on several occasions wearing the Broncos sweatshirt and black knit cap that the suspect was wearing during the bank robbery.


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 **KEITH ANTHONY RAMIREZ** plea of guilty to the offense charged in the Indictment.

  
SPIRO G. LATSIS  
Assistant United States Attorney

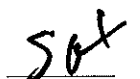

4-17-19  
Date

  
TOWNSEND MYERS  
Counsel for the Defendant

4/18/19  
Date

  
KEITH ANTHONY RAMIREZ  
Defendant

4-18-19  
Date

AUSA   
Defendant   
Defense Counsel 