

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO.: 18-229

v.

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SECTION: "D"

JAMES RAIFORD

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FACTUAL BASIS

Defendant **JAMES RAIFORD** ("RAIFORD") has decided to enter a plea of guilty in the above-captioned matter. Should this matter have proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt, through credible testimony and reliable evidence. The facts outlined herein occurred within the jurisdiction of the Eastern District of Louisiana.

Agents with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") conducted an investigation into armed robberies occurring at various businesses located in New Orleans, Louisiana during April of 2018. On April 17, 2018, **RAIFORD** robbed the Boost Mobile cellular telephone store located at 7058 Read Boulevard, while brandishing a firearm. On April 19, 2018, **RAIFORD** robbed the Boost Mobile cellular telephone store located at 5741 Crowder Boulevard, while brandishing a firearm. On April 19, 2018, **RAIFORD** robbed the Dollar General store located at 11020 Morrison Road, while brandishing a firearm. On April 24, 2018, **RAIFORD** robbed the Kwik Pik gas station and convenience store located at 10040 Morrison Road, while brandishing a firearm. The last robbery occurred on April 25, 2018, at the Boost Mobile cellular telephone store located at 2277 St. Claude Avenue. **RAIFORD** brandished a firearm during the robbery.

AUSA BLR
Defendant SR
Defense Counsel WY

April 17, 2018 robbery of Boost Mobile

On April 17, 2018 at approximately 7:43 p.m., **RAIFORD** entered the Boost Mobile cellular store located at 7058 Read Boulevard. The victim store clerk, J.B., was assisting two customers when **RAIFORD** entered the store. J.B. realized that the store was being robbed when she observed the customers she was assisting place their hands in the air and cease talking. J.B. placed her hands in the air as well. J.B. observed **RAIFORD** brandishing a black handgun.

A member of the New Orleans Police Department reported to the location following the robbery. In her interview J.B. stated that **RAIFORD** ordered the customers to leave the store. The customers left the store, leaving J.B. in the store. At that time, **RAIFORD** instructed J.B. to "Gimme all the money that's in the register." In response, J.B. took the money from the register and placed it on the counter. **RAIFORD** then grabbed the money and walked towards the door. **RAIFORD** received one thousand three hundred dollars (\$1,300.00) in U.S. currency.

A nearby witness observed **RAIFORD** enter the store prior to the robbery. The witness described **RAIFORD** as wearing a black mask, and in possession of a black "Hi-Point" 9mm handgun, with an extended magazine.

April 19, 2018 robbery of Boost Mobile

On April 19, 2018, at approximately 7:55 p.m., **RAIFORD** entered the Boost Mobile cellular store located at 5741 Crowder Boulevard. **RAIFORD** approached the victim, A.R., while brandishing a firearm. According to A.R., **RAIFORD** held the gun to her back and said, "Where's the money at?" A.R. went to the back room where a second employee, J.B., the victim of the April 17, 2018, robbery was counting money. Upon entering the back room, **RAIFORD** ordered J.B. to "Go get the money." A.R. and J.B. handed **RAIFORD** the money before he left the store. **RAIFORD** received one thousand three hundred twenty-two dollars (\$1,322.00) in U.S. currency.

April 24, 2018 attempted robbery of the Dollar General store

On April 24, 2018, the New Orleans Police Department was dispatched to a robbery occurring at the Dollar General Store located at 11020 Morrison Road. According to the victim, R.H., **RAIFORD** entered the store brandishing a black semi-automatic pistol with an extended magazine, pointed the gun at her, and demanded that she, "Give it up." R.H. did not heed to the demand. As a result, **RAIFORD** attempted to take the cash register drawer, but was unable to do so. **RAIFORD** then fled the location and headed in the direction of the Kwik Pic gas station located next door to the Dollar General store.

April 24, 2018 robbery of the Kwik Pic gas station

On April 24, 2018, at approximately 8:22 p.m., **RAIFORD** entered the Kwik Pik gas station convenience store. According to victim #1, S.M., she observed her husband, victim # 2, H.M., attempt to close the door of the store when he observed **RAIFORD** walking in the direction of the store, possessing a black semi-automatic firearm. **RAIFORD** attempted to force himself into the convenience store. **RAIFORD** over-powered H.M. and stuck his arm through the door before H.M. could close the door. Upon entering the store, **RAIFORD** pointed the gun directly at S.M. **RAIFORD** then grabbed H.M. by the wrist and dragged him to the cash register. **RAIFORD** pointed the weapon at S.M. and demanded that she open the register. S.M. complied. **RAIFORD** grabbed approximately six hundred dollars (\$600.00) in U.S. currency from the cash register before fleeing the scene.

April 25, 2018 robbery of the Boost Mobile store

On April 25, 2018 at 6:25 p.m., **RAIFORD** entered the Boost Mobile cellular store located at 2277 St. Claude Avenue. At the time, the victim sales associate, D.G., was assisting customers when she observed **RAIFORD**, brandishing a firearm with an extended magazine, approach the

counter. **RAIFORD** demanded that the customers leave the store. **RAIFORD** demanded that D.G. open the cash register. **RAIFORD** then pointed the firearm at D.G. In response, D.G. explained that she could not open the register. **RAIFORD** proceeded to make his way behind the register and began attempting to open the register. While **RAIFORD** attempted to open the register, D.G. fled the store through a rear door. D.G. returned to the store and saw that **RAIFORD** opened the cash register. **RAIFORD** took three hundred fifty dollars (\$350.00) in U.S. currency from the Boost Mobile store.

Execution of Search Warrant

Detectives assigned to the New Orleans Police Department (“NOPD”) obtained video surveillance after the robbery. **RAIFORD** was identified by a member of NOPD who was familiar with **RAIFORD** due to an unrelated incident in which **RAIFORD** was shot in the leg. While reviewing surveillance footage, the detectives identified **RAIFORD** by a distinguishing characteristic, a limp in his walk which resulted from the shooting. After being positively identified, **RAIFORD** was arrested.

In an effort to further their investigation, detectives obtained a search warrant for **RAIFORD**’s residence. A gold colored Apple I-Phone was recovered during the robbery. A search warrant was obtained for the cellular telephone. After executing the warrant and receiving the data, detectives located searches about the robberies. **RAIFORD**’s telephone revealed a number of searches for “Boost Mobile robbery.” The searches were conducted after the April Boost Mobile robberies committed by **RAIFORD**.

The phone records also revealed an April 26, 2018 visit to website www.nola.com. **RAIFORD** clicked on an article about the attempted robbery of the Dollar General store and the Kwik Pik gas station and convenience store.

Detectives also recovered photographs in the cellular telephone depicting **RAIFORD** possessing firearms matching the description of the weapons used during the robberies.

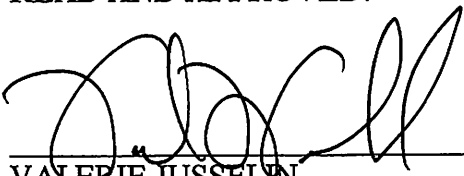
Jurisdictional Nexus

Should this matter have proceeded to trial, a representative of Boost Mobile, Dollar General, and the Kwik Pik gas station would have testified that at the time of the robberies of each respective business, that the aforementioned businesses conducted their business in and affecting interstate commerce in that many of the products sold to its customers were obtained from producers and manufacturers outside the state of Louisiana, as well as suppliers inside the state of Louisiana, that obtained their products outside the state of Louisiana.

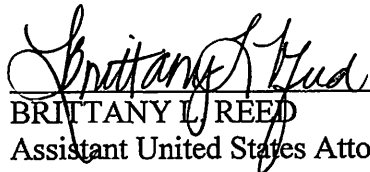
Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **RAIFORD**, and it is not a complete statement of all facts described by **RAIFORD** 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 **RAIFORD**'s plea of guilty to the charged offenses.

READ AND APPROVED:



VALERIE JUSSSELIN 8-20-19
Counsel for JAMES RAIFORD Date



BRITTANY L. REED 08/20/2019
Assistant United States Attorney Date



JAMES RAIFORD 8-20-19
Defendant Date