

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 21-147
v. * SECTION: "G"
JOSEPH REED *

* * *

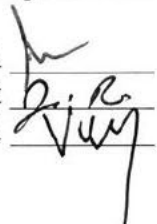
FACTUAL BASIS

The above-named defendant, **JOSEPH REED**, ("REED") 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 allegations contained in the Indictment, namely that **REED** committed bank robbery as that crime is defined in Title 18, United States Code, Section 2113(a).

On Saturday, October 9, 2021, at approximately 10:00 a.m., the Chase Bank located [REDACTED] in New Orleans, Louisiana was robbed. The suspect was described as a black male, approximately 6'2" tall, 180-185 pounds, wearing a baseball hat, white t-shirt, blue jeans and wearing a white surgical mask. **REED** entered the bank on foot, approached the counter and slipped a note underneath the protective glass. The note, which was later recovered by the New Orleans Police Department Crime Laboratory, stated the following: [REDACTED]

[REDACTED] The victim teller was unable to dispense the cash requested by the suspect. The suspect then removed his phone from his pocket and appeared to try and take a photograph of the victim teller and his/her manager. The defendant agrees that his demand note and actions in using his phone to make the teller and manager think that he had their pictures establishes the required elements of attempting to take money from a bank by means of intimidation. An attempt is when

AUSA
Defendant
Defense Counsel



a defendant does an act that constitutes a substantial step towards the commission of that crime and that strongly corroborates the defendant's criminal intent and amounts to more than mere preparation. The term "by means of intimidation" is to say or do something in such a way that a person of ordinary sensibilities would be fearful of bodily harm. A review of the bank surveillance footage also depicted the suspect removing his phone from his pocket and then attempting to take a photograph of the bank employees.


Surveillance footage obtained from a residence near the bank captured the suspect walking towards the bank without a mask on. The FBI released photographs to the public in an effort to identify the suspect. Following the release of these photographs, the FBI received several anonymous tips identifying the suspect as **REED**. Record checks identified **REED** as matching the description of the suspect. [REDACTED]

[REDACTED]

Ring doorbell footage was located which showed **REED** returning to his residence on October 9, 2021, wearing the same clothing worn during the bank robbery.

Agents from the Federal Bureau of Investigation would further testify that Chase Bank had deposits that were insured by the Federal Deposit Insurance Corporation at the time of the attempted bank robbery.

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The foregoing facts would be proven by the testimony of agents and employees from the Federal Bureau of Investigation, Jefferson Parish Sheriff's Office, New Orleans Police Department, Chase Bank, as well as by the production of various certified documents.




JON M. MAESTRI
Assistant United States Attorney

4.14.22
Date



JOSEPH REED
Defendant

4.14.22
Date



VALERIE WELZ JUSELIN
Attorney for Defendant

4-14-2022
Date