UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA		*		CRIMINAL DOCKET NO. 10-175
		*		
v.		*		SECTION: "J"
		*		
ERROL HARRIS		*		
		*		
		*		
		*		
	*	*	*	

FACTUAL BASIS

The above-named defendant **ERROL HARRIS** has agreed to plead guilty as charged to Counts 1 and 3 of the three-count Indictment in this case. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts to support the allegations against the defendant, **ERROL HARRIS** ("HARRIS"):

The morning of May 4, 2010, **ERROL HARRIS**, Corey Richardson and Doriyah Jordan drove in a Dodge Charger to Edgard, Louisiana, following co-conspirator Vincent Beverly, who was driving a Chevy Lumina. The Dodge Charger was a rental car and had been rented by **HARRIS'** girlfriend. The four individuals drove to Beverly's sister's house. When they arrived

at Beverly's sister's house, Richardson, Beverly and others, had a discussion about robbing the Capital One Bank located in Edgard, Louisiana. Shortly thereafter, Beverly drove Jordan to the Capital One Bank, so Jordan could survey it and determine how many people were inside. While inside the bank, Jordan communicated to Richardson via cellular telephone. Richardson and **HARRIS** were sitting outside the bank in the Dodge Charger, while Beverly was outside in the Chevy Lumina. Once Jordan left the bank, Beverly drove Jordan back to his sister's house, where Richardson and **HARRIS** met them. Jordan got out of Beverly's car and sat in the Dodge Charger once again. **HARRIS**, Richardson and Jordan left for a short while to go to a nearby convenience store. While at the convenience store, **HARRIS** and Richardson asked the clerk if the store carried bandanas. The store did not carry the type of bandanas **HARRIS** and Richardson were looking for. **HARRIS**, Richardson and Jordan returned to Beverly's sister's home.

Shortly thereafter, **HARRIS**, Richardson and Jordan drove to the Capital One Bank. **HARRIS** and Richardson, with their faces covered, entered the bank, while Jordan remained in the backseat of the Dodge Charger. Both **HARRIS** and Richardson were armed with handguns. **HARRIS** approached the assistant branch manager seated at her desk, pointed a firearm at her and ordered her to get up. **HARRIS** led the assistant branch manager to the area in front of the teller counter and ordered her to lie on the ground. Richardson, who was carrying a black drawstring bag, jumped over the teller counter. Richardson removed U.S. currency from the teller drawers and placed the currency in the bag. **HARRIS** then stated, "I'm going to take

2

anyone that comes in the door, hurry up." A male customer then entered the bank and **HARRIS** grabbed him and threw him to the ground. Richardson then jumped back over the counter and both robbers exited the bank. **HARRIS** and Richardson entered the Dodge Charger and left the bank premises. Richardson was driving, while **HARRIS** was in the front passenger seat and Jordan was in the backseat.

A police vehicle immediately followed behind **HARRIS**, Richardson and Jordan. Beverly, who was in his Chevy Lumina and remained in close proximity to the bank during the robbery, called Richardson and informed him that they were being followed by police. Richardson and Beverly tried to coordinate a place where Beverly could meet them. When another police car attempted to pass Beverly on the two-lane highway to catch up to the Dodge Charger, Beverly drove his Chevy Lumina slowly and in the middle of the street to slow the officer's progress. During the police chase, Richardson crashed the Dodge Charger into the woods. **HARRIS**, Richardson and Jordan all ran from the car into the woods. Richardson called Beverly and told him the car had crashed and that they needed Beverly to pick them up. Beverly drove around the area of the woods where **HARRIS**, Richardson and Jordan were, but was unable to locate anyone before his arrest.

HARRIS was found by a police dog and was arrested within the police perimeter after several hours.

3

An audit conducted after the robbery revealed that approximately \$21,649.00 U.S. currency of bank funds were taken by **HARRIS** and Richardson from the Capital One Bank. On May 4, 2010, the Capital One Bank located at 2447 Highway 18, Edgard, Louisiana, had its deposits insured by the Federal Deposit Insurance Corporation.

ELIZABETH PRIVITERA, #27042 (Date) Assistant United States Attorney

WILLIAM GIBBENS Attorney for Defendant (Date)

ERROL HARRIS Defendant (Date)