

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL NO.: 19-145**
v. * **SECTION: "T"**
RICHARD SANBURY *
* * *

FACTUAL BASIS

The defendant, **RICHARD SANBURY**, has agreed to plead guilty as charged to Count One, Count Two, and Count Three of the three-count Indictment. Count One charges **SANBURY** with conspiring to commit a robbery of a pharmacy distributing controlled substances, in violation of Title 18, United States Code, Section 2118(d). Count Two charges **SANBURY** with an armed robbery of a pharmacy distributing controlled substances, in violation of Title 18, United States Code, Sections 2118(a), 2118(c)(1), and 2. Count Three charges **SANBURY** with discharging a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c).

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment:

On Monday June 17, 2019, at about 6:07 a.m., **ALAN PARSON** and **RICHARD SANBURY** entered the CVS Pharmacy (24 hour pharmacy) located at 4901 Prytania Street, New Orleans, Louisiana to commit an armed robbery. The pharmacist working at the CVS Pharmacy at that time was a person registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act, as required by statute. The robbers came in the front doors. The store manager observed the robbery taking place from within a locked office in the store and called 911 to alert authorities.

SANBURY forced the cashier into the restroom and zip tied his hands together. Simultaneously, **PARSON** relocated to the pharmacy, placed the pharmacist on the ground at gunpoint, and zip tied his feet

together. Both robbers then began removing narcotics from behind the pharmacy counter, placing them into a black bag. Drugs from the black bag, which was ultimately left on the scene, included “controlled substances” as that term is defined in Section 102 of the Controlled Substances Act. While the robbers were taking the narcotics, **SANSBURY** became frustrated with pharmacist’s movements and zip-tied his hands together. The robbers then tried to leave the store via the front doors with the stolen narcotics.

As this was occurring, members of the New Orleans Police Department were notified of an armed robbery in progress and quickly arrived at the CVS Store. Officers entered the store and encountered the two robbers as they were attempting to exit the store. Upon observing the officers, the robbers retreated into the store, dropping the bag of pills near the front door, which caused numerous pill bottles to fall to the floor. The officers retreated to the exit. The robbers regrouped inside the store and then relocated closer to the store’s exit, firing at the responding police officers, who were seeking cover outside the doors and in the parking lot of the shopping center. The robbers eventually ran out of the store, continuing to engage the officers in gunfire. The robbers attempted to run across Prytania Street. A New Orleans Police Officer sustained a gunshot wound to the shoulder area.

Much of what is described above was captured on video, both from the CVS cameras and from body cameras worn by the responding officers. The video shows the events unfolding as they are described.


During his attempted escape, **PARSON** sustained multiple gunshot wounds and was apprehended near the corner of Upperline and Prytania Streets immediately following the robbery. **PARSON** was transported to University Medical Center to be treated for his gunshot wounds. **SANSBURY** also sustained a gunshot wound to his leg as he was shooting his way out of the CVS and was apprehended several hours later hiding in the rear yard of 1116 Upperline Street. **SANSBURY** was transported to University Medical Center to be treated for his gunshot wound.

Both **PARSON** and **SANSBURY** are from Indianapolis, Indiana and traveled to New Orleans, Louisiana shortly before the attempted robbery.

Surveillance footage shows that at least one other individual was involved in the robbery. Specifically, agents obtained footage showing **PARSON** and **SANSBURY** being dropped off by a newer


model silver Ford F-250 four-door truck just before the robbery began. Neither of them got of the driver's door and the truck drove off after dropping them off, meaning someone had to have been driving.

This proffer of evidence is not intended to constitute a complete statement of all facts known by 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 legal basis for SANSBURY's plea of guilty to the charged offenses.



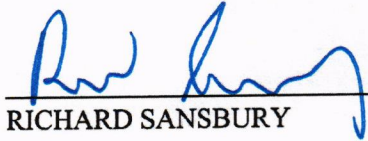
BRITTANY REED
Assistant United States Attorney

05/24/2021
Date



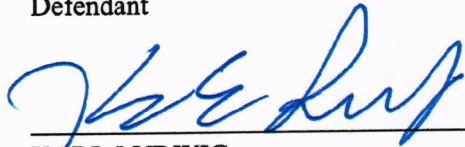
DAVID HALLER
Assistant United States Attorney

5/24/2021
Date



RICHARD SANSBURY
Defendant

5/21/21
Date



KARL LUDWIG
Attorney for Defendant

5/21/21
Date