

State of Louisiana
V.
Wood

Synopsis

On June 2, 2023, at 5:20 pm Louisiana Capital Bank was robbed. Grande Parish police department received a call, in reference to this bank robbery. This call was from a bank teller at Louisiana Capital Bank requesting assistance because the bank had been robbed minutes before. When the police arrived, they interviewed two eyewitnesses, C. Rowan and H. Blanchard. When investigating the scene, an AA sobriety coin was found. After too many coincidences, the evidence led to the raid of B. Wood's home where a Remington 870 shotgun and ammunition were found. This shotgun appeared to be the same one the witnesses described in the event. Days after the raid and the arrest of B. Wood, a bag of money was found in a trash can on the side of the road between B. Wood's home and the bank.

Available Witnesses

Prosecution:

- C. Rowan, Bank Teller
- H. Blanchard, Janitor
- S. Jones, Detective

Defense:

- B. Wood, Defendant
- R. Wolfe, Detective
- A. White, Defendant's Mentor

The first name of any of the available witnesses can be selected by the team calling that witness. At captains meeting, each team must identify the first name of each witness and provide a proper pronunciation of that witnesses first name to the opposing counsel.

Exhibit List:

Exhibit 1: Photo of Remington 870 found at B. Wood's home.

Exhibit 2: Photo of Shotgun Shells and empty shell box recovered from B. Wood's home

Exhibit 3: Photo of the note taped to A. White's car

Exhibit 4: Floor Plan of Louisiana Capital Bank

Exhibit 5: AA sobriety Coin

Exhibit 6: Segment of 911 call

STATE OF LOUISIANA ~ PARISH OF GRANDE
SEVENTY-FIFTH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

FILED: _____

VERSUS

NO. CR 2021-2034

WOOD

DEPUTY CLERK OF COURT

STIPULATIONS

- (1) For the convenience of the parties, witnesses, court, and jury, all potential exhibits have been pre-labeled and pre-numbered. Those numbers will be used for all purposes at trial, regardless of which party first offers the exhibit or the order in which the exhibits are offered.
- (2) The parties, having engaged in discovery, agree that no documents other than Exhibits 1 - 6 are relevant. This stipulation does not bar objections to Exhibits 1-6. This stipulation also does not address demonstrative aids that may be used during trial that may or may not be admitted into evidence.
- (3) All parties and witnesses are of at least of normal intelligence and none has or ever has had a mental condition that would impact a person's perception, memory, or ability to respond to questions on cross examination.
- (4) B. Wood has chosen to testify in this case, and has waived all 5th Amendment protections, and all other parties have waived any 5th Amendment protections that they may have been able to claim in this matter.
- (5) All objections based on improper search and seizure under the 4th Amendment have been waived.
- (6) All objections to the authenticity of any Exhibit have been waived, and all Exhibits are what they purport themselves to be. However, all other objections related to any Exhibit are preserved for trial.
- (7) All objections to Exhibit 4 are waived, and either party may enter Exhibit 4 into evidence at any point after opening statements.
- (8) This trial is only as to the guilt of B. Wood, and the sentencing of B. Wood, if found guilty, will be given at a later date.
- (9) It is stipulated that Exhibits 1 and 2 were found at the home of B. Wood during a valid search of the home conducted by the proper authorities.

- (10) All objections relating to the chain of custody of any evidence represented in any Exhibit have been waived.
- (11) Exhibit 1 is an accurate representation of the firearm at issue in this matter.
- (12) The gun depicted in Exhibit 1 was purchased by and is licensed to B. Wood.
- (13) For the purposes of LA. R.S. 14:64 a shotgun qualifies as a dangerous weapon.

STATE OF LOUISIANA ~ PARISH OF GRANDE

SEVENTY-FIFTH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

FILED: _____

VERSUS

NO. CR 2021-2034

WOOD

DEPUTY CLERK OF COURT

BILL OF INDICTMENT

THE GRAND JURORS OF GRANDE PARISH, CHARGE THAT, IN THE STATE AND PARISH AFORESAID:

COUNT ONE – ARMED ROBBERY

ON OR ABOUT JUNE 2, 2023, IN GRAND CITY, GRANDE PARISH, LOUISIANA B. WOOD DID WILLFULLY AND UNLAWFULLY COMMIT **ARMED ROBBERY** AT LOUISIANA CAPITAL BANK BY TAKING PROPERTY FROM ANOTHER BY THREAT OF VIOLENCE WITH THE INTENT TO KEEP IT PERMANENTLY, IN A VIOLATION OF LA. RS 14:64.

A TRUE BILL

/s/ JOHN DOE
Foreperson of the Grand Jury

CADE P. CADERSON

Cade P. Caderson,
Asst. Dist. Attorney
Seventy-Fifth Judicial District

STATE OF LOUISIANA ~ PARISH OF GRANDE

SEVENTY-FIFTH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

FILED: _____

VERSUS

NO. CR 2021-2034

WOOD

DEPUTY CLERK OF COURT

RELEVANT LOUISIANA STATUTES AND LAW

The only statutes applicable to this case are set forth below.

Additionally, all trials in the Seventy-Fifth Judicial District are governed by the National High School Mock Trial Rules of Evidence, as well as Rules of Competition provided in the Handbook

STATUTORY LAW

La. R.S.14:64. Armed Robbery

- A. Armed robbery is the taking of anything of value belonging to another from the person of another or that is in the immediate control of another, by use of force or intimidation, while armed with a dangerous weapon.
- B. Whoever commits the crime of armed robbery shall be imprisoned at hard labor for not less than ten years and for not more than ninety-nine years, without benefit of parole, probation, or suspension of sentence.

STATE OF LOUISIANA ~ PARISH OF GRANDE

SEVENTY-FIFTH JUDICIAL DISTRICT COURT

STATE OF LOUISIANA

FILED: _____

VERSUS

NO. CR 2021-2034

WOOD

DEPUTY CLERK OF COURT

JURY CHARGE

Ladies and Gentlemen, you have now heard all of the evidence that is to be presented in this case. You have also heard the arguments of the attorneys.

It is now my duty to instruct you on the law that applies to your deliberations. It is your duty to follow these instructions in reaching your verdict. Although you are the sole judges of the law and the facts on the question of guilt or innocence, you have the duty to accept and apply the law as given by the court. You must decide the facts from the testimony and other evidence and apply the law to those facts in reaching your verdict.

You must not single out any of these instructions and disregard others. The order in which the instructions are given does not indicate that one instruction is more important than another.

If I have given you the impression that I have an opinion regarding any fact in this case, you are to disregard that impression. If I have given the impression that I have an opinion concerning the guilt or innocence of the accused, you are to disregard that impression. The law does not permit the Court to make any comment upon the evidence or the testimony. You alone decide what facts have been proven and what has not been proven. Each of you must base your verdict solely upon the evidence and testimony presented throughout this trial and disregard any other thing that you may have read or heard concerning this case from any other source.

This case has been brought to court by the return of a Grand Jury Indictment. An indictment is nothing more than a written, formal accusation against the accused charging him with a crime. You are not to consider the indictment as evidence against the accused. The mere bringing of an indictment creates no inference whatsoever that the accused is guilty. It is simply the method by which the accused is brought to trial.

Statements and arguments made by the attorneys are not evidence. In opening statements, the attorneys are permitted to familiarize you with the facts they expect to prove. In closing arguments, the attorneys are permitted to present for your consideration their analysis of what the evidence has shown or not shown and what conclusions they think may be drawn from the evidence. Therefore, the comments, the objections, the opening and closing arguments of the attorneys for either side are not evidence. You can accept them or reject them depending on whether or not they appear to be reasonable and logical and coincide with whatever facts you find to have been proven or not proven.

You must decide the facts only from the evidence presented. As jurors, you are not to be influenced by sympathy, passion, prejudice, or public opinion. You are expected to reach a just verdict. The evidence which you should consider consists of the testimony of the witnesses and of exhibits such as writings and physical objects which the Court has permitted the parties to introduce. You must not consider any evidence which was not admitted, or which you were instructed to disregard, or to which an objection was sustained.

The accused is presumed to be innocent until each element of the crime necessary to constitute his guilt is proven beyond a reasonable doubt. This legal presumption of innocence is sufficient to create a reasonable doubt and sufficient to acquit the accused if it has not been properly rebutted by the State. The State accuses, therefore the State must prove what it claims is

true. The accused is not required to prove that he is innocent. The accused is not required to call any witnesses or to produce any evidence, though they have the right to do so. Thus, the accused begins the trial with a clean slate.

The burden is upon the State to prove the accused's guilt beyond a reasonable doubt. In considering the evidence, you must give the accused the benefit of every reasonable doubt arising out of the evidence or out of the lack of evidence. If you are not convinced of the guilt of the accused beyond a reasonable doubt, you must find them not guilty. Reasonable doubt is doubt based on reason and common sense and is present when, after you have carefully considered all the evidence, you cannot say that you are firmly convinced of the truth of the charge.

While the State must prove guilt beyond a reasonable doubt, it does not have to prove guilt beyond all possible doubt. The State does not have to prove the guilt of the accused to one hundred percent perfection or to an absolute certainty. The law recognizes that all human endeavors falls short of perfection; and, therefore, it is sufficient, if after a full consideration of all of the evidence, that you are honestly convinced from the evidence that the accused is guilty beyond a reasonable doubt.

As jurors, you alone shall determine the weight and credibility of the evidence. You are the sole judges of the credibility of witnesses and of the weight their testimony deserves. You should scrutinize carefully the testimony given and the circumstances under which each witness has testified. In evaluating the testimony of a witness, you may consider the following factors: (1) his or her ability and opportunity to observe and remember the matter about which he or she has testified, (2) his or her manner or demeanor while testifying, (3) any reason he or she may have for testifying in favor of or against the State or the accused; and (4) the extent to which the testimony is supported or contradicted by any other evidence.

You may take into account the probabilities or improbabilities of what the witness has testified about and any prejudice or bias on the part of the witness. You must weigh and evaluate the testimony of each witness to determine whether it's believable or not, correct or incorrect, truthful or false.

Under the law, it is presumed that no witness has deliberately testified falsely or attempted to mislead you. However, you have the right to disregard or disbelieve the testimony of any witness as being unworthy of belief and proving nothing. You can accept as true, or reject as false, any part of or all of the testimony that you've heard from any witness in the case depending on whether you believed it to be true or not.

IMPEACHMENT- PRIOR INCONSISTENT STATEMENT

The testimony of a witness may be discredited by showing that the witness made a prior statement which contradicts or is inconsistent with his or her present testimony. If you find that a prior inconsistent statement was made, the prior statement may be considered for the truth of the matter asserted in the statement only if you find that there exists additional evidence to corroborate the matter asserted by the prior inconsistent statement.

CIRCUMSTANTIAL EVIDENCE

Evidence may be direct or circumstantial.

Direct evidence is evidence which if believed proves a fact at issue directly and without inference from other facts. (Eyewitness testimony is an example of direct evidence.)

Circumstantial evidence is evidence of fact which may be inferred from the existence of other facts relating to the questions at issue. For example, if someone came into the courtroom with a dripping umbrella and a wet raincoat, you could reasonably infer from those facts that it is raining outside, although you do not have any eyewitness testimony that it is raining outside.

Circumstantial evidence is legal and competent evidence and must be considered by you together with the direct evidence, if any, which may have been presented at the trial.

When the evidence in a case consists of both direct and circumstantial evidence, the rule is: you must not convict unless you are convinced beyond a reasonable doubt of the accused's guilt.

When the evidence in a case consists solely and exclusively of circumstantial evidence, the rule is: you must not convict the accused unless, the circumstantial evidence is so compelling that it eliminates or rules out every other reason, theory, or explanation of the defendant's innocence.

EXPERT TESTIMONY

You have heard testimony of a witness who is characterized as an expert. An expert is one who as the result of knowledge, experience, training or education has acquired specialized knowledge in an art, science, or craft.

It is the duty of the jurors to consider the opinions of an expert together with all the other testimony in the case, and to give them such weight as they deem proper.

The testimony of experts is merely offered to assist the jury in understanding the evidence or determining facts at issue. However, experts are not called into court for the purpose of deciding the case. You, the jurors, are the ones, in law, who must bear the responsibility of deciding the case. The experts are merely witnesses and you have the right to either accept or reject their testimony and opinions in the same manner and for the same reasons for which you would accept or reject the testimony of any other witness.

FLIGHT OF THE ACCUSED

You may also consider the flight of the accused, or his attempt to escape detection. Flight, if established by the evidence, does not, by itself, raise a legal presumption of guilt. The fact of an accused having fled, if proven, is merely another fact in the case to be considered in relation to

all the other facts that have been proven in the case. Flight may be prompted by a sense of guilt, but not necessarily so. You are entitled to give whatever weight you feel proper to the alleged flight, if you find that it has been established by the evidence.

EXPLANATION OF STATUTORY LAW TO BE APPLIED

The accused in this case is charged with **Armed Robbery**. In order to find the accused guilty of Armed Robbery you must find:

(1) Find that the Defendant took something of value that belonged to another from the person of another or something that is in the immediate control of another; and

(2) That the Defendant took said item by the use or force or intimidation, while armed with a dangerous weapon.

The State has the burden of proving intent beyond a reasonable doubt. Article 10 of the Louisiana Criminal Code provides that there are two types of criminal intent. They are specific intent and general intent. Armed Robbery requires the presence of specific intent. Specific intent is defined as that state of mind which exists when the circumstances indicate that the offender actively desired the prescribed criminal consequences to follow his act. General criminal intent is present whenever there is specific intent, and also when the circumstances indicate that the offender, in the ordinary course of human experience, must have adverted to the prescribed criminal consequences as reasonably certain to result from his act or failure to act.

Criminal intent is an essential element of the crime of Armed Robbery and must be proven as any other fact. However, intent is not an objective thing that can be displayed to you. It is a subjective thing within the mind; it is within the thinking of an individual; and although it is a fact that must be proven to your satisfaction and beyond a reasonable doubt, it need not be proven in the same manner as other facts are proven. It may be inferred from the circumstances surrounding

the transaction. Intent, absent an admission of such by the defendant, must necessarily be proven by inferences drawn from surrounding facts and circumstances.

Thus, if you are convinced beyond a reasonable doubt that the accused is guilty of Armed Robbery under the definition provided above, your verdict should be GUILTY.

If you are not convinced beyond a reasonable doubt that the accused is guilty of Armed Robbery under the definition provided above, your verdict should be NOT GUILTY.

Affidavit of C. Rowan

BEFORE ME, the undersigned legal authority in and for the State of Louisiana, Parish of Grande personally came and appeared C. ROWAN, who after being duly sworn, did depose and state, as follows:

My name is C. Rowan and I currently work as a bank teller in Grande City, Louisiana. I was actually born in Michigan, but my family and I moved to Louisiana when I was only 7 years old. After graduating from high school, I decided I wanted to pursue a job in a bank setting. I have always had a love for money collecting and saving, so I knew a job as a bank teller was perfect for me. I graduated with a bachelor's degree in finance from Rowan University. The name was the cherry on top for why I chose to get my degree from RU. As soon as I graduated, I started working at Louisiana Capital Bank at age 21. My first day of work I knew this was where I belong, and I have been working at the same branch for 19 years since.

Like I said, I love my job. However, what I experienced on June 2nd truly made me question if I knew what this job could entail. In my 19 years of experience, I have never worked a day so terrifying. It started out like any other day. I woke up at 5:30am and everything was relatively normal. I made it to work at 6:45am. I have come in 15 minutes early every single workday for the past 19 years, but I didn't have to worry about opening since our janitor H. Blanchard normally arrives at 6:30. Blanchard has been working at the bank for as long as I can remember so we normally let them stick to their routine. I started my shift at 7:00am, and nothing out of the ordinary occurred. That was until 5:20. I heard the front doorbell ring as the door opened. When I looked up, I saw a blur as someone approached me wearing all black clothing, sunglasses, and a black hat. The rest is still traumatizing for me to remember, but the man demanded money from me while holding me at gunpoint. Bank tellers are trained on what to do in the event of a

robbery. My branch teaches me that if my life is in danger, to put my safety first, so that is exactly what I did. I handed over the money and fell to the floor in tears. I was extremely distraught, but after I was able to pull myself together a little bit, I realized I should pull our security alarm. Like I said, it is all a blur to me now, but I pulled our security alarm around 6 minutes after the robber ran out the door.

A few weeks later, I was watching the news at home when I heard a report that a suspect of the robbery was listed as B. Wood. Wood is a usual client at our branch. Wood normally comes once a week. I thought it was funny that I had not yet seen Wood on the week of the robbery but chalked it up to that it may have just been a busy week for them and they did not have time. Regardless, when the authorities case reached out to me, I felt that I had a duty to testify as one of the only eyewitnesses of the robbery. I do recall that from what I could identify of the robber, they did seem to resemble Wood in more ways than one. For example, I could see the ends of the robber's hair sticking out from under the black cap the robber was wearing, and it was a strikingly similar color to Wood's. Also, the robber had on these sunglasses that blocked me from looking into their eyes. I vividly remember looking at the robber and only seeing my own reflection staring back at me in the lenses. This struck me as odd because Wood has come into the bank on multiple occasions wearing almost identical sunglasses. Obviously, more than one person can have the same color hair and sunglasses, but given the circumstances, I thought that it was definitely worth noting.

As far as I know, the only other eyewitness would have been our bank janitor, H. Blanchard. The time of the robbery fell right during Blanchard's daily cleaning routine right before close. Right before the robber came in, I saw Blanchard pass by the front door with their cleaning cart. This was the same routine Blanchard always followed, starting to clean by the front door and then moving towards the back. Blanchard always stops to take a drink from their flask halfway

through their routine near the bathrooms. I am not sure what is inside the flask, but I can say for a fact that I have never seen Blanchard without his flask in hand.

I must also disclose that Wood and I did previously know each other. We went to high school together back in the day, but we were never close. In fact, there were sometimes that I remember Wood would pick on me a bit more than I was comfortable with. Although we did not get along well in high school, we never had too much of an issue. To this day, we get along fine and Wood is one of my favorite clients to see come in the door.

After that day at the bank, I was devastated. I have been attending counseling to try to overcome this challenge, but I don't know if I will ever fully recover from the trauma. Eventually though, I was able to face my fears and return to work.

I agreed to and completed this affidavit under oath.

C. Rowan
C. Rowan

Affidavit of H. Blanchard

BEFORE ME, the undersigned legal authority in and for the State of Louisiana, Parish of Grande, personally came and appeared, H. BLANCHARD, who after being duly sworn, did depose and state, as follows:

My name is H. Blanchard and I am 56 years old. I was born in the state of Virginia, but because of my father's military lifestyle, we never stayed anywhere too long. Around the age of 13, my mother received word that my father had passed after becoming ill while away on base. This led me and my mother to move out of Virginia and into a small apartment with my Uncle Randle right along the coast of Louisiana. With my father's job having brought in all of our finances and mother never working a day in her life, money began to dwindle and we were eventually left with nothing. My mother then fell sick with measles and passed away when I was around the age of 16. My uncle worked as the janitor at Louisiana Capital Bank and he began to find it harder to sustain both of our livelihoods. So to help bring in more money for the two of us, he managed to get me a cleaning job at the bank when I turned 17.

After my Uncle Randle passed, I became the primary janitor for the bank and have been working there for the past 39 years. I am what some may call a work veteran, I know this building like the back of my hand as I have cleaned every nook and cranny of it for almost all of my life. I have seen managers and employees come and go, and I even picked up on the names of a few of our regular customers who come into the bank. I always arrive at work at 6:30 am to make sure that things are ready for the opening of the bank. I start by sweeping the floors and getting the coffee started in the break room for the employees. After doing my morning duties, I normally walk around or hang out in the basement and relax until my next cleaning shift at 5 PM, unless something needs to be immediately cleaned up, like if a kid gets sick or someone spills coffee.

Out of my 39 years working for the Louisiana Capital Bank, the day of June 2nd was unlike any other. I always carry with me the black flask that was my father's. It was all I had left of him so, it's safe to say I made good use of it. This day was slower than normal, so I picked up my flask and laid in the basement until my next shift began. I ended up falling asleep, but I woke up with 3 minutes to spare until my shift began. I hurried and grabbed my cleaning cart and made my way to the front of the bank. It was around 4:28 whenever I began cleaning, and since the bank closes at 6, this was always the perfect amount of time to get my final cleaning done. Everything was fine until around 5:20. I had just finished whipping down the front windows and began to take a quick sip from my flask when I noticed a man with a long trench coat, matching hat, and dark black sunshades walk into the bank.

I looked up and saw the man pointing a gun at our bank teller, C. Rowan, and loudly demand money from them. As I said, I am very familiar with the bank and the majority of those who come in. The robber's voice sounded familiar. After deciding that my aching back wouldn't have allowed me to be much help, I chose to simply hide behind my cleaning cart in hopes of not being discovered. After receiving the money from Rowan, who was in pure shock and fear, the robber ran out of the building through the side door. I walked up to Rowan to make sure they were okay, but as I walked up, I noticed a shiny gold coin with the letters AA on it. The thief must have dropped it on their way out. I placed the coin onto the desk until the police arrived.

Ever since that day, I decided to put away my flask and retire from the bank. I realized that the majority of my life had been spent dedicating my time to cleaning and if the robber would have noticed my witnessing of the crime, who knows what could have occurred. I am now retired but I will probably begin working again in the next year or so, but I will not be cleaning a bank.

I am familiar with exhibits 3 and 4. I agreed to and completed this affidavit under oath.

H. Blanchard

H Blanchard

Report of S. Jones

Introduction

1. I am Detective S. Jones. I am 43 years old. I currently work for Grande Parish Police in the Criminal Investigations Department or CID. I started working for the Grande Parish Police Department when I was 19 and saw a job listing for a jail guard. I worked in the jail for 10 years, but eventually, I was offered a position on the road working patrol. I loved being on the road it was exciting and there was never a dull moment. I was working patrol for about 11 years, but I got married and my partner encouraged me to see if there was a more stable department for me to go into. I took that recommendation to heart and saw CID had an opening. I took a 20-week course at the Grande Parish Police Academy, it was very difficult, but I made it through. I got a job in the CID as a detective, and I've been working investigating crimes for about 3 years. On June 2, 2023, at 17:32 I arrived at Louisiana Capital Bank in response to an Armed Robbery call with Detective R. Parks.

Data Collection

2. I was called to the scene of this crime with my investigative partner at the time R. Parks. Once we arrived on the scene, the first step as is standard in this type of investigation, is securing the scene of the crime. After the scene was secured, I made note of the layout of the bank and all entrances and exits. I did this so that I could determine what direction the suspect may have gone in after they fled the scene. There are 2 doors in the lobby of the bank, either one may have been used by the suspect. The main entrance is located at the front of the building and faces in a northern direction. At the other end of the lobby, an exit-only door is reserved for emergencies.

3. I noticed the presence of security cameras in Louisiana Capital Bank. I obtained a few still images from the surveillance system. I found an Alcoholics Anonymous Sobriety coin on the teller's counter. There was not any other physical evidence at the scene of the crime that Detective Parks or I collected. I was able to obtain a floorplan of Louisiana Capital Bank by asking the owners and having the floorplan assisted in my investigation.
4. After obtaining the physical evidence me and Detective Parks began interviewing witnesses at the scene to obtain a clearer picture of what occurred. There weren't many people in the bank at the time of the robbery, as it was close to closing. The janitor working at the time was present, along with a bank teller. I interviewed the teller while Parks interviewed the janitor. When interviewing C. Rowan, the bank teller, I was able to obtain details regarding the suspect's physical characteristics including an approximate height and hair color. Rowan also informed me that when the suspect entered the bank and began making demands, Rowan followed protocol, handed over the money demanded, and then hit the alarm under the tellers' counter. Rowan was the person who called the police to report the crime. Detective Parks talked to the janitor, H. Blanchard. According to Detective Parks' notes H. Blanchard witnessed a person in black clothing that disguised the person's identity, including a trench coat and dark sunglasses. Unfortunately, Detective Parks has since passed after being hit by a drunk driver on his way home from work on June 5th, 2023, so all that remains of Parks' investigation are the investigation notes that I utilized in investigating this crime and creating this report.
5. After speaking with the witnesses, we were able to determine the door that the suspect exited from and the likely path of the suspect took after exiting the bank, which was an alleyway. I looked in the alleyways behind Louisiana Capital Bank. I noticed that a

trashcan was knocked over in the alley. In the trashcan, I found a heap of money with a busted dye pack stuffed inside it. After taking pictures of the money and collecting it for evidence, I returned to the office with evidence in order to investigate the identity of the suspect in this robbery.

Analysis

6. Due to the delay between the suspect leaving the premise and the 911 call, tracking the suspect down that day was not possible. A key part of uncovering the suspect's identity was the analysis of the still photographs taken from the video surveillance of the bank at the time of the robbery. The angle of the camera can make the relative heights of people and the objects within a room inaccurate, but the eyewitnesses testimony gave us the height of the suspect. When utilizing the surveillance footage with the description of the suspect given by the eyewitnesses, a clear description of the suspect was able to be gathered.
7. The AA coin gathered from the scene lead me to believe the suspect was an attendee of local AA meetings. I spoke with the coordinator of the local AA chapter, A. White, and was able to obtain a list of attendees who matched the description of the suspect. A majority of the people on this list had alibies for the time of the robbery. There were only two attendees who did not have alibies. One of them I could not ever contact, but the other person was B. Wood. I was able to confirm that Wood, a member of AA, is a resident of Grande Parish and a customer of Louisiana Capital Bank. While there were no fingerprints to confirm, based on the testimony of the witnesses, I determined that the AA Coin belonged to the robber.
8. Once it was clear that B. Wood's was our likely suspect, a team of officers and I executed a search warrant at Wood house. Inside we found a Remington 870 12 Gauge that was

taken into evidence. This weapon matched the description given by the eyewitnesses at the scene. We also found a box of 12-gauge shotgun shells. Wood was then taken into custody and booked on charges of Armed Robbery. Wood refused to admit to any wrongdoing, but Wood did admit that they had just lost their job and had no money, I am not sure why they said that to me.

9. B. Wood has a history with the Grande Parish Police department, but most of it is in the past. Back when I was on patrol, I ran into Wood a few times relating to DUIs. Grande Parish isn't that big, and back in the day everyone knew of Wood as a drunk. Recently I've heard rumors of Wood getting sober and getting their act together. In 2020, I pulled over a car because it was exhibiting classic signs of drunk driving and generally unsafe practices. In the car was B. Wood, and when I conducted a field sobriety test on Wood, it was clear to me that Wood was in no condition to be operating a car. Other than this and the case in question I have no other connections to B. Wood.
10. Wood also told me that they had a brother that was the same general build, had been at their house on June 2, 2023, and had a criminal record. However, I found no evidence that Wood's brother had a criminal record. Despite this, I tried to find Wood's brother, but was simply unable to. I did not feel the need to investigate this any further, because of the substantial evidence I found tying Wood to the crime.

Evidentiary Matters

11. I am familiar with all exhibits.
12. The still frames from the video surveillance footage of the bank and the photograph I took of the cash and busted dye pack I found were all destroyed in a fire that occurred at the

Grande Parish Police Department Evidence locker, but the statements made above in my report relating to those are accurate reflections of my memory of the same.

S. Jones

S. Jones

Report of R. Wolf

Introduction

1. I am Detective R. Wolf. I am 32 years old. I serve as a criminal private detective for Wolf's Investigation Firm. I am from Naples Parish (about 30 mins away from Grande Parish), where I obtained a 2-year associate degree in criminal justice at the College of Naples. After graduating, I completed the required physical training and academic courses for the Naples Police Department. The training and academic courses were a 20-week process and I am proud to say that I was one of the students to pass all the required training and academic courses. Only 10% of my peers passed to become assistant detectives. As an assistant detective, I worked alongside other detectives to gather and collect evidence related to criminal cases. After 2 years, I was promoted to detective where I began to take on more obligations. As a detective, I had to examine the evidence, interview victims and witnesses, observe and interrogate suspects, write detailed reports about our investigations, prepare cases, and testify in court. After an additional 5 years of experience, I became the lead detective. As lead detective, I had to take charge of crime scenes and organize how the detectives and assistant detectives will break down a scene. I kept working as a lead detective of the Naples Police Department until I was fired for having a relationship with my ex-partner, Ashley. Ashley had several charges of counterfeiting and they were facing 15 years. Before I got fired, all charges were dropped. The police department blamed me. I was fired for a conflict of interest since I did not disclose that I was the lead detective in the investigation against Ashley and because I knew Ashley personally. The police department said that I needed to disclose that information. That it would be a conflict of interest to have a relationship with any victims, criminals, and witnesses in my

investigation(s). There was also an allegation that I removed evidence from the evidence locker relating to a case against Ashley, but that was never proven. If I had done such a thing, I would have been smart enough to be sure there was no evidence. A couple of months after being fired, I decided to open up my own investigation firm.

Investigation

2. Typically, in my line of work, I am hired by criminal defendants. In these cases, I look for reasonable doubt. On August 20, 2023, I received a call from the Defense attorneys in this matter, asking if they can hire me to review this case. Given the short notice, my years of experience and the fact that I have now testified in 22 other cases (16 of which, the defendants were found not guilty), I decided to charge 20% higher than the average investigator would charge for this type of case.
3. When I looked at the case I recognized the defendant, B. Wood. I've known Wood for the past 10 years. When I first met Wood, they were always drinking. Wood was a person you would call a drunk, but they were a good person. Eventually, Wood's antics caught up to them and they received 2 DWIs between 2019 and 2020, but the charges were later dropped. All I have to say is that if it wasn't for me, Naples Police Department would have had Wood locked up!
4. Usually in cases like these I am hired after the incident took place. So, I usually rely on witnesses and the detective's affidavits to come to my own conclusion. In this case, I looked at it a bit more. I reviewed Rowan's affidavit, Blanchard's affidavit, Det. Jones Report, Wood's affidavit, and White's affidavit.

Analysis

5. Since the police department couldn't track where or which way the suspect went, they could only guess. We do know that the person shown in the camera footage provided by the bank was similar in build to Wood. However, this surveillance does not tell us with certainty that Wood was the person committing the robbery.
6. When looking at the affidavits of Rowan and Blanchard I noticed they were the only eyewitnesses. I noticed that the teller ultimately described the hair and a bit of the suspect's face, but the teller was not able to describe the suspect during the 911 call. Based on their affidavits, Rowan and Blanchard can only testify to the fact that the suspect looked similar to Wood.
7. As for the detective on the scene, I am aware that Detective Jones did the investigation. At the scene, an AA sobriety coin was found. Detective Jones was quick to assume that this sobriety coin was Wood's. Detective Jones failed to mention that this bank had many customers throughout the day and that it could have been anyone else's sobriety coin. This sobriety coin could have been anyone's, and no fingerprints of Wood were found on it.
8. After analyzing the testimony in the affidavits related to the shotgun, I have reason to believe Wood's story as to why the gun was in their possession. I noticed the plug was pulled from the Remington 870. Normally, a gun like this is used for duck hunting, and if you are duck hunting it has to have a plug, or it is illegal. The only reason to pull the plug from a shotgun would be to use it for self-defense. In Wood's statement, Wood stated he was familiar with guns, specifically shotguns and pistols. Wood stated they had the shotgun for the purpose of getting their brother to leave their residence. While a shotgun could be used to rob a bank, I find it hard to believe someone like Wood, who had knowledge of

guns, would have chosen a Remington 870 for that purpose, given its size and difficulty to conceal.

9. Further, I do not think Det. Jones investigated the possibility that Wood's brother was the robber. Despite Wood told Jones that Wood's brother was the same build, had been at the house, and had a criminal record, they did not find Wood's brother to ask him about the date in question or his whereabouts.

Conclusion

10. Based on the evidence and analysis, I believe there is reason to doubt Wood was the bank robber. Most bank robbers usually have a violent criminal history, which Wood did not have. Additionally, there is no specific testimony tying him to the scene.

Evidence

13. I am familiar with the following exhibits and only the following, 1, 2, 3, 4, 5 & 6.

R. Wolf

Affidavit of B. Wood

BEFORE ME, the undersigned legal authority in and for the State Louisiana and Parish of Grande, personally came and appeared, B. WOOD, who after being duly sworn, did depose and state, as follows:

My name is B. Wood. I am 42 years old. I am originally from Mississippi, but after my dad died when I was ten, my mom moved my brother and I to Louisiana. You would think this would've been a good decision for my brother and I to get away from the memories of my dad, but it ended up being the worst thing my mother ever did. See, she never really got over my dad's death. She was never really at home, and when she was, she would drink and let's just say my brother and I weren't treated right. This pushed me into drinking and by the time I was 18, which was all I really did for a long time after that. I tried to get a few jobs here and there and turn my life around, but nothing ever stuck. I guess I never got over my dad's death either.

When I turned 28, I couldn't take it anymore. I decided to join a local AA group and stop drinking. It was the hardest thing I've ever done in my life. I'm ashamed to say I've relapsed several times since joining, but I've been sober for three years now. Getting my three-year chip was my biggest achievement in life. I worshiped that thing. It represented the best thing I had ever accomplished in my life. I kept it with me everywhere I went. However, one day in late May of 2023, I set it down while I was getting some money out of my pocket I guess, and I haven't been able to find it since.

I bank at Louisiana Capital Bank. I have ever since I was 30. Every time I go, I make sure I see the same bank teller, C. Rowan. We went to high school together, and I like talking to them whenever I can. I wasn't the best person to them in school. I was always drinking, and I guess I was jealous of Rowan because they had a stable family and a dream to be a bank teller. I just had

a dream for my mom to be there when I got home. As part of my AA, I had to make amends with everyone I had wronged in the past, which included Rowan. Ever since then, I've tried to be as nice as I could be to Rowan. However, that was still hard since deep down I was still jealous. I don't think Rowan could tell that though, and I think they like seeing me now, or at least they're always friendly to me when I come in. I hated hearing what happened to them on June 2, 2023.

That day was not a good one for me. Come to think of it, that week hadn't been good either. Normally I try to make it into the bank on Mondays and Wednesdays to turn in the cash I earn on the job. I've been working as a taxi driver ever since I got out of high school. I know it sounds crazy since I'm an alcoholic, but I never went to work on days I had been drinking. Well, that week, I had drank one too many days and lost my job. I relapsed that week, because my brother got out of jail that week, and I had to deal with them. That was why I never got to go to the bank that week, I had no money to deposit and my brother was hounding me.

I said earlier that I never got over my dad's death, but my brother was 15 when it happened and I guess the death hit him harder than it did me. When we moved to Louisiana, he got in with the wrong crowd, and he's been in and out of jail ever since. He steals a lot, and he's not very good at it. He seems to always get caught. For all I know, I might not have lost my AA chip, he might've taken it. Anyways, it's always a bad time when he comes around, as evidenced by my relapse and losing my job.

On June 2, 2023, it all went bad. My brother came into my house at 5 AM, drunk and just started tearing everything up. I tried to get him to stop but he wouldn't. I finally pulled out my shotgun and told him to get out. It wasn't loaded or anything, I just needed something that would get his attention. I know a lot about guns because my brother would bring them in the house. When my AA mentor A. White found out about my brother, and how he was, White convinced me to get

a shotgun after taking me duck hunting a few times and seeing how good I was with it. I normally would have gotten a handgun for self-defense, but the shotgun was cheaper.

I guess the sight of the gun worked how I wanted it to because when my brother saw it, he looked at the gun for a minute and then just ran. I felt so bad after he left because I want more than anything to mend the relationship with my brother and help him better. I didn't know what to do, so I turned to the only thing that would bring me comfort. I picked up one of the bottles he brought in and just started drinking. And then I picked up the next one and the next one. Finally, I realized the mistake I'd made, and I put on my trench coat and hat, and I left the house. I walked to where I knew White worked and I left a note on their car.

After that, I was so ashamed of myself I planned on making a run for it. I didn't have any money or anything, I just wanted to leave Louisiana. I was tempted to turn to the tactics of my brother and just steal the funds, but I decided to go back home. It was only about a five-minute walk from my place to White's. But when I got back home, it looked like my home had been broken into. I must've blacked out at that point because I don't remember anything. I woke up to the police coming in saying I robbed a bank, and I just remembered walking home and nothing else after getting there.

I've done stuff I couldn't remember when I was drunk before, but I don't think I could rob a bank. However, they said my gun was used in the robbery. I told them I didn't know how that happened, and that I thought my home had been broken into, but they said there was no evidence of that in their investigation. I also saw photographs of the person that robbed the bank from the surveillance video, I guess I look like the guy in the pictures a little, but I just walked back home. I don't know what I did after blacking out, and I can't really ask anyone because no one else was

here when I got home. I haven't heard from my brother since he ran out of the house. I did tell the cops that I had the same general build as my brother though.

I am familiar with exhibits 1, 2, 3 and 5. I agreed to and completed this affidavit under oath.

/s/ **B. WOOD**
B. Wood

Affidavit of A. White

BEFORE ME, the undersigned legal authority in and for the State of Louisiana and Parish of Grande, personally came and appeared, A. WHITE, who after being duly sworn, did depose and state, as follows:

My name is A. White, and I am 35 years old. I am currently the owner of Streetside Pawn Shop and my business has served the Grande Parish area for nearly half a century. Prior to becoming the sole operator of Streetside Pawn, my father owned the store and managed it himself. I inherited the store when my father passed away five years ago. Prior to my father's death, I was in the National Guard and served as an armorer. As an armorer, I was expected to ensure that all of the weapons that were checked out for training were returned and clean. Over the years I served in the National Guard, I became proficient in doing inspections that were helpful in determining the quality and condition of firearms. If a firearm became too worn, it was replaced, or parts were changed. My knowledge of determining the condition of guns has helped me to place a value on the used firearms that I buy and sell at Streetside Pawn.

My father passed away 5 years ago from liver failure due to alcoholism at the age of 50, which has impacted my life tremendously. I had planned to remain in the National Guard until I was forced to leave due to age constraints, however the events following my father's death derailed this plan. My father was my biggest role model and I had always looked up to him, and when he was gone, I felt like I had nobody to talk to. Though I had sworn I would never drink like he did, I turned to hard liquor, hoping to find some sense of comfort in the bottom of a bottle. Unfortunately, I lost control of how much I drank, and soon I was finding myself sneaking drinks into the barracks and getting drunk before reporting for duty. My Commanding Officer began to notice that I was unlike myself and questioned me quite often about my ability to work. I was able to shake him off most of the time, but as I drank more it became more obvious that I was drunk on the job. Eventually, my commanding officer suggested that I resign from the National Guard. If I didn't, he would be forced to report the incidents in which I was drunk on the job, which would

have almost certainly resulted in a dishonorable discharge. I weighed my options but ultimately retired from the National Guard.

Freshly retired from the National Guard, I decided to try to take back control of my life and stop drinking. My commanding officer had suggested that I join the Alcoholics Anonymous twelve-step program, which I did. However, I had to drive to meetings in the next town, as my town currently did not have any meetings being held. Because of this, after I was clean, I decided to become a program sponsor and begin holding my own meetings in the community center near the pawn shop. The program has been a great success and I have met many great men and women who have shared their stories and helped me to continue to stay sober. I have been sober for three years and am proud to say that the program has helped several others sober up and get their lives back on track.

I have made several friends since I began sponsoring the AA meetings. Of all of them, however, I must say, my closest friend is definitely B. Wood. Wood was one of the first attendees of the meetings I sponsored and they showed a powerful dedication to becoming sober and improving their life. Wood had mentioned that they had been drinking since they were 16 years old and began drinking more heavily when they were 18. Wood's drinking was so severe that Wood was arrested twice for DUI. Wood and I often went to dinner together and celebrated life events with each other. I remember buying a cake for Wood when they had made one year sober. Briar and I made sure we abstained from drinking and instead found ways to keep ourselves busy so we didn't think about having a drink. When I was trying to quit drinking, I realized that a hobby would help to take my mind off of the urge to drink, so I took up hunting. Dad had taken me duck hunting as a child, and I found that going duck hunting would be a meaningful way to spiritually reconnect with him.

At the beginning of last duck season, I asked Wood if they would like to come hunting with me. Upon hearing the question, Wood simply said, "I don't know if hunting is for me. I don't like to be around guns because of my brother." When I told Wood that they could just come sit with me in the duck blind and watch me hunt, they finally agreed. On our first hunt together, I could see Wood flinch and cover their ears every time I fired a shot at a duck, however I could tell that they enjoyed the overall experience. We

made it a habit of going hunting together and one day Wood asked if they could try to shoot a few ducks themselves. I agreed and Wood shot six ducks within an hour, which was impressive and showed me that they knew their way around a gun. I could tell by this point that they were hooked. On the ride back from the duck blind, Wood mentioned that they wanted to purchase a shotgun from me so that we would not have to share a gun on our next hunt. The next day, I called Wood and told them to meet me at my pawn shop. I had a 12 Gauge Remington 870 that I was going to sell to them for 50 percent off of the original price. I told Wood that the Remington 870 I had was purpose built for bird hunting and the long barrel would be perfect for high flying ducks. It was also a very reliable shotgun, using the same action as the combat-spec Remington 870's we used in the National Guard. Wood came with cash-in-hand to buy the gun. Their background check did take longer than most, which could indicate a history of non-felonious crimes (probably just their DUIs), but eventually came back clear and Wood bought the shotgun and a 25 round box of #4 lead birdshot for duck hunting. Wood and I went hunting every weekend after that until duck season was over.

After duck season, Wood and I still saw each other weekly at the AA meetings, but we began to see each other more rarely outside of the meetings. I do not know why this was the case, but I noticed in April that Wood asked me if I would still be their friend if they ever started drinking again. I told Wood that I would still be there for them no matter what, but that question bothered me and I worried why they would ask such a question. Ever since, Wood has occasionally missed meetings and their last meeting with me, a week before their arrest, they arrived late to our meeting and Wood slurred a few words throughout the meeting. On the evening of June 2, 2023, I found a note taped to my car. The note read, "Can we meet up as soon as possible? I messed up. I don't think I can ever recover from this one." At the bottom of the note it was signed "B.W.". I called Wood's home phone the next morning but got no answer.

Later that day, I was sitting at the counter when a police car pulled up by the shop. The cops came into the shop and told me that Wood had been arrested and charged with armed robbery after being suspected of robbing a local bank. Police had suspected Wood of using the shotgun I sold him in the robbery. The officers asked me if the gun in the photos they took at Wood's home was the Remington 870

shotgun that I sold Wood. I told them that it certainly looked to be. According to the officers, the shotgun was loaded with 5 shells of buckshot ammo. When I sold Wood the shotgun, it had a magazine plug that prevented the firearm from being loaded with more than 3 shells. Plugs like these are required if you are hunting migratory birds. This plug would have had to have been removed from the shotgun in order to increase the capacity to 5 shells. The officers showed me photos of the buckshot shells loaded in the gun; however I do not know where the shells came from. I do not recall ever selling Wood buckshot shells, which was weird since they always came to me to buy ammo since I gave them such great deals.

I have no reason to believe that Wood committed the crime that they are being accused of. Wood was following the straight and narrow path to recovery and had really impressed me with their ability to resist the urge to drink. Despite my concerns that Wood might have fallen off the wagon, I was not sure of this, so I had no reason to suspect it or bring that up to anyone. Wood had no violent criminal history, which I knew from the background check, so I find it difficult to believe that Wood would jeopardize the life that they were working so hard to fix on a bank robbery. On top of all that, the Remington 870 that they are accusing Wood of using was purpose built for shooting birds, not robbing banks. The 28-inch, long-range barrel would be extremely difficult to maneuver in the small corridors of a building. I know this because the National Guard stocked our armory with Remington 870's with 18.5-inch barrels, which were short enough for easily maneuvering in the tight corridors of a building.

I am familiar with exhibit 1, 2, and 3. I agreed to and completed this affidavit under oath.

Alberta White

Alberta White

Exhibit 1



Exhibit 2

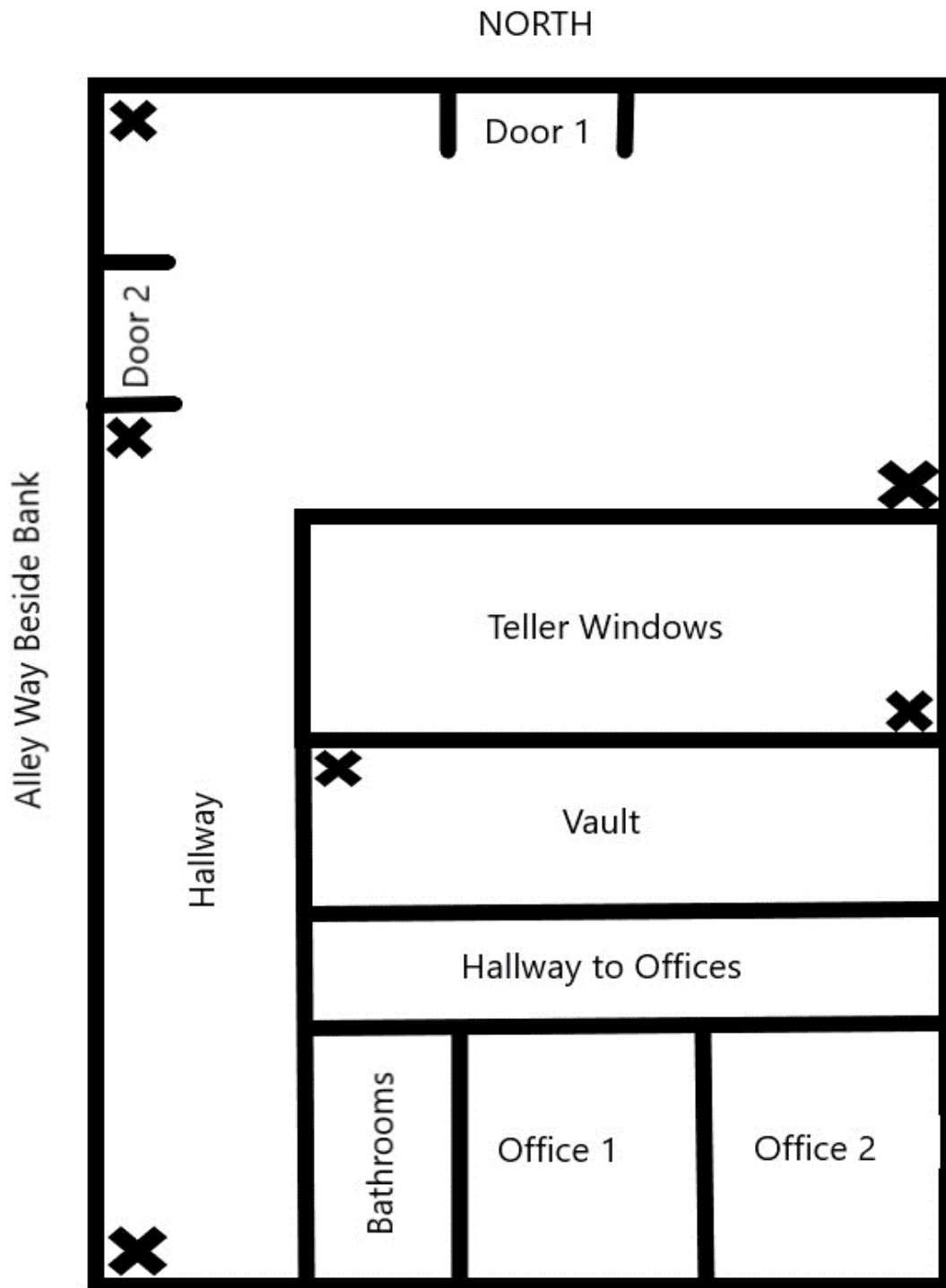


Exhibit 3

CAN WE MEET UP
AS SOON AS POSSIBLE?
I MESSED UP. I DON'T
THINK I CAN EVER
RECOVER FROM THIS ONE.

- B. W.

Exhibit 4



X marks locations of Cameras

Exhibit 5

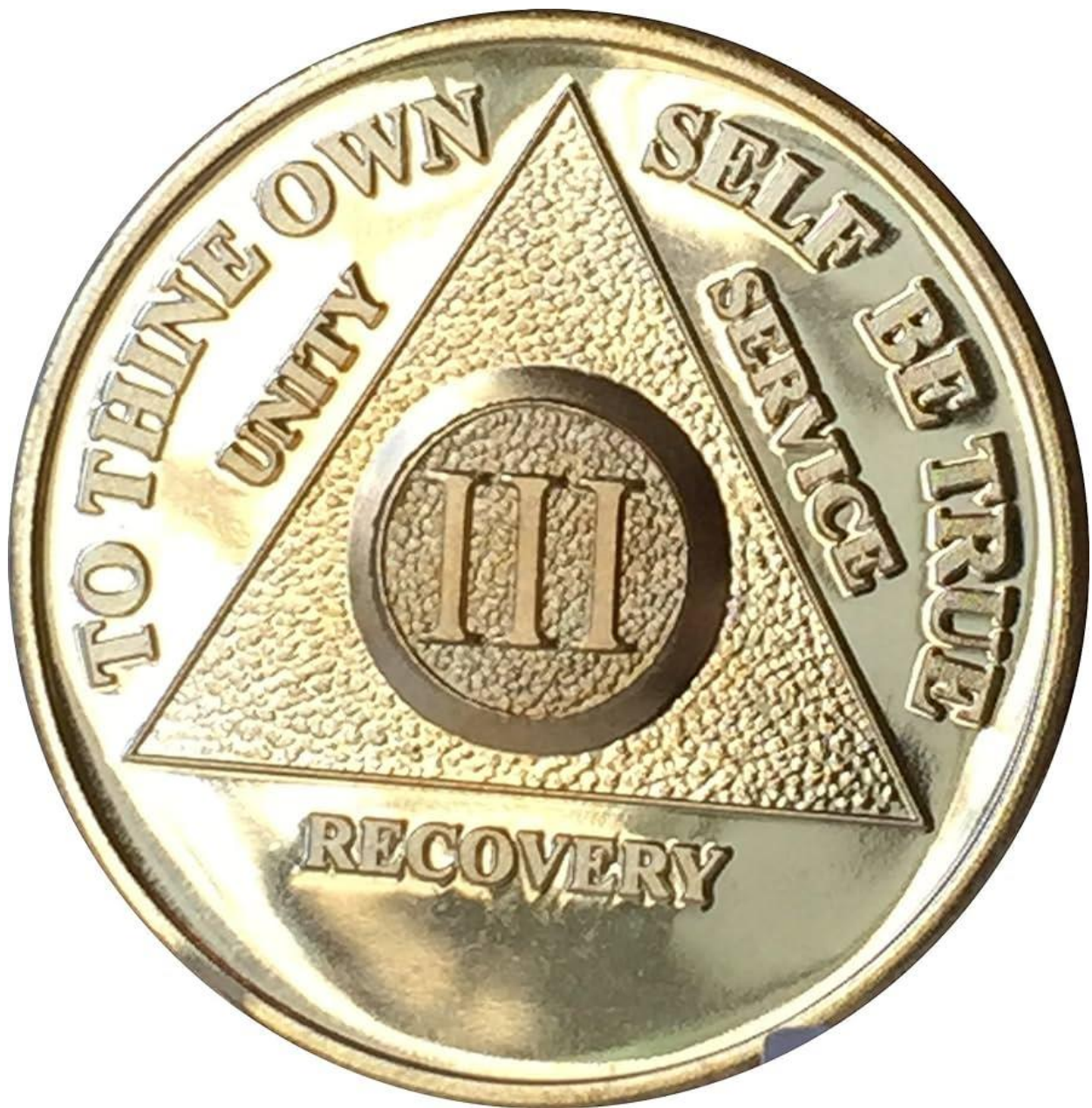


Exhibit 6

911 Call Transcript

911 Operator: This is 911, what is your emergency?

Caller: I'm a teller at Louisiana Capital Bank, we were just robbed at gun point!

911 Operator: Ok, I know the location of the bank and am sending officers now. What is your name?

Caller: My name is C. Rowan, I'm a teller at the bank. Please tell the officers to hurry, I don't know if the robber might come back.

911 Operator: Can you identify the suspect?

Caller: I don't know, I can't think straight. I don't know who it was.

911 Operator: Ok, that is fine. Officers are on the way. I will stay on the line with you until they arrive.

Caller: Ok, thank you.

911 Operator: Just let me know when the officers arrive.

Caller: They just arrived.

911 Operator: Ok, go and talk with the officers. Thank you for calling.