

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 21-187  
v. \* SECTION: "G"  
JAVONTE RICHARD \*  
\* \* \*

FACTUAL BASIS

Defendant, **JAVONTE RICHARD** ("**RICHARD**") has agreed to plead guilty to the indictment, charging her with one count of theft of mail by a postal employee, in violation of 18 U.S.C. § 1709. Should this matter have gone to trial, the Government 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 defendant.

At all times material herein, the defendant, **RICHARD**, was employed by the United States Postal Service as a letter carrier working at the Johnson Street Post Office in Metairie, Louisiana, which is located in the Eastern District of Louisiana.

The Government would establish that the case against the defendant, **RICHARD**, began on October 30, 2019 as a result of complaints received by the U.S. Postal Service, Office of Inspector General ("**USPS-OIG**") concerning missing parcels received by the Johnson Post Office, that were to be delivered by **RICHARD**. On November 14, 2019, USPS-OIG Special Agents placed a package in the mail to be processed and delivered by **RICHARD** while on her route. The item was a Priority Mail package addressed to a fictitious person and address: [REDACTED]

[REDACTED] At


AUSA [Signature]  
Defendant [Signature]  
Defense Counsel [Signature]

approximately 7:06 AM, **RICHARD** reported to work at the Johnson Street Post Office. Agents monitored Richard as she delivered her route. At approximately 6:26 PM, **RICHARD** opened the package. Shortly after, USPS-OIG Special Agents stopped **RICHARD** while she was seated in her Long Life Vehicle (LLV) in the 4200 block of Belvedere in Metairie. Upon stopping **RICHARD**, they observed **RICHARD** re-taping the package. Agents identified themselves to **RICHARD** and she was verbally advised of her *Miranda* rights. **RICHARD** admitted to opening the package. **RICHARD** then accompanied the agents to the Johnson Street Post Office to be interviewed. Prior to questioning, **RICHARD** was again advised of her *Miranda* rights via Office of Inspector General (OIG) form "Miranda Rights." **RICHARD** acknowledged she understood her rights and signed the form. **RICHARD** admitted that said she knew it was wrong to remove packages from the mail.

Both the Government and the defendant, **RICHARD**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the Government would have proven these facts beyond a reasonable doubt at trial.

  
\_\_\_\_\_  
JON M. MAESTRI                      4-14-22  
Assistant United States Attorney                      Date

  
\_\_\_\_\_  
JAVONTE RICHARD                      4.14.22  
Defendant                      Date

  
\_\_\_\_\_  
DENNIS MOORE                      4-14-22  
Counsel for Defendant                      Date