

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

**UNITED STATES OF AMERICA**

\*

**CRIMINAL NO. 21-186**

**v.**

\*

**SECTION: "E"**

**KYLE ARMSTRONG  
KAREEM MADISON**

\*

\*

\* \* \*

**FACTUAL BASIS**

The defendant, **KYLE ARMSTRONG** ("ARMSTRONG") has agreed to plead guilty to the indictment, which charges him with two-counts. Count one charges **ARMSTRONG** with theft or receipt of stolen mail matter in violation of Title 18, United States Code, Sections 1708 and 2. Count two charges **ARMSTRONG** with unlawful possession of a postal key in violation of Title 18, United States Code, Sections 1704 and 2.

Should this matter have proceeded to trial, **ARMSTRONG** stipulates that the government would have proven, through the introduction of credible testimony from witnesses and admissible, tangible exhibits, the following facts beyond a reasonable doubt, to support the allegations in the indictment now pending against **ARMSTRONG**. Both the government and **ARMSTRONG** stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which **ARMSTRONG** is pleading guilty. The following acts occurred within the jurisdiction of the Eastern District of Louisiana.

On December 9, 2021, law enforcement officers witnessed **ARMSTRONG** and Kareem Madison using a United States Postal Service ("USPS") "Arrow Key" to make unlawful entry into three blue collection boxes at the Metairie Main Post Office located at [REDACTED] Metairie, LA

AUSA *RC*  
Defendant *KA*  
Defense Counsel *Renc*

70002. **ARMSTRONG** removed the U.S. mail articles from the boxes and placed them into a duffel bag while Madison stood near the corner of a nearby strip mall. **ARMSTRONG** was wearing a USPS carrier uniform shirt but is not a USPS employee.

After stealing the mail, **ARMSTRONG** got in the passenger seat and Madison got in the driver's seat of a Nissan Rogue. **ARMSTRONG** and Madison were stopped in the vehicle by officers with the United States Postal Inspection Service ("USPIS") and the Jefferson Parish Sheriff's Office. **ARMSTRONG** and Madison were ordered to put their hands in the air, and USPIS inspectors observed a USPS "Arrow Key" in **ARMSTRONG**'s hand as he raised his hands. **ARMSTRONG** and Madison were taken into custody. Investigators observed a black Glock Model 26 handgun [REDACTED] with an extended magazine lying on the concrete just below the driver's door of the vehicle. Investigators observed a tan Glock Model 26 handgun [REDACTED] with an extended magazine on the passenger side floorboard of the vehicle. Investigators also observed a black Adidas duffel bag containing a significant amount of U.S. mail matter on the floorboard of the vehicle. A search of the black duffel bag led to the discovery of approximately 424 pieces of stolen U.S. mail and approximately 20 checks stolen from the Greater New Orleans area and Metairie. Some of the checks appeared to have been attempted to be "washed."

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

K.A.  
R.A.  
R.C.

BAC  
K.A.  
R.C.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **ARMSTRONG**, and it is not a complete statement of all facts described by **ARMSTRONG** to the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **ARMSTRONG's** plea of guilty to the charged offense.

Rachal Cassagne 7/20/22  
RACHAL CASSAGNE (Date)  
Assistant United States Attorney

Roma Kent 7-20-22  
ROMA KENT (Date)  
Attorney for Defendant

Kyle Armstrong 7-20-22  
KYLE ARMSTRONG (Date)  
Defendant