

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 21-186

v.

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SECTION: "E"

KAREEM MADISON

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* * *

FACTUAL BASIS

The defendant, **KAREEM MADISON** ("MADISON") has agreed to plead guilty to Count 3 of the indictment which charges **MADISON** with being a felon in possession of a firearm in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Should this matter have proceeded to trial, **MADISON** 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 **MADISON**. Both the government and **MADISON** stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which **MADISON** is pleading guilty. The following acts occurred within the jurisdiction of the Eastern District of Louisiana.

On December 9, 2021, law enforcement officers witnessed **MADISON** and Kyle Armstrong 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 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.

AUSA RC
Defendant KM
Defense Counsel WJ

After stealing the mail, Armstrong got in the passenger seat and **MADISON** got in the driver's seat of a Nissan Rogue. **MADISON** and Armstrong were stopped in the vehicle by officers with the United States Postal Inspection Service ("USPIS") and the Jefferson Parish Sheriff's Office. **MADISON** and Armstrong 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. **MADISON** and Armstrong were taken into custody. Investigators observed a black Glock Model 26 handgun [REDACTED] with an extended magazine lying on the ground just below the driver's door of the vehicle where **MADISON** was sitting. Investigators also observed a tan Glock Model 26 handgun [REDACTED] [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."

Prior to this, **MADISON** had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: on October 30, 2014, **MADISON** pleaded guilty in the 24th Judicial District Court in Jefferson Parish, Case No. 14-1931 "P," for violating La. R.S. 40:26:966(A), possession of a schedule I controlled dangerous substance.

The black Glock Model 26 handgun [REDACTED] fits the definition of "firearm" as described in Title 18, United States Code, Section 921(a)(3). Before **MADISON** came into possession of the black Glock Model 26 handgun [REDACTED] [REDACTED] it travelled in interstate commerce.

Rachal Cassagne 7/10/22
RACHAL CASSAGNE (Date)
Assistant United States Attorney

Willard Brown 7/7/22
WILLARD BROWN (Date)
Attorney for Defendant

Kareem Madison 07/07/22
KAREEM MADISON (Date)
Defendant