

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO. 18-124

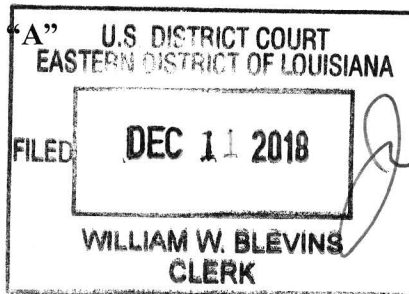
v.

*

SECTION: "A"

TERRY MADISON, III

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* * *

FACTUAL BASIS

The above-named defendant, TERRY MADISON, III, ("MADISON") has agreed to plead guilty as charged to Count One of the Indictment, which charges the defendant with Hobbs Act Robbery in violation of Title 18, United States Code, Section 1951(a), of the Walmart Money Center in Hammond, Louisiana, in the Eastern District of Louisiana, on April 14, 2018. Had this matter proceeded to trial, the government would have proven beyond a reasonable doubt that MADISON committed the crime described in the Indictment.

Facts

Walmart Money Centers

At all material times during MADISON's conduct described in the Indictment and in this Factual Basis, Walmart was an international company engaged in interstate commerce through, *inter alia*, retail sale of groceries and other goods, and the Walmart Money Center was a financial services center that engaged in banking services such as check cashing and wire transfers. MADISON's robbery of the Walmart Money Center described herein obstructed, delayed, or affected commerce, as that term is defined in Title 18, United States Code, Section 1951.

____ Fee _____
 ____ Prepaid _____
 ____ Doc. No. _____

AUSA MR
 Defendant JM
 Defense Counsel [Signature]

Walmart Money Center in Hammond, Louisiana

On April 14, 2018, at approximately 10:21 a.m., MADISON entered the Walmart Supercenter located at 2799 W. Thomas Street, Hammond, Louisiana. MADISON then entered the Walmart Money Center located inside the Walmart and gave the victim teller a demand note which read, "Give me all the large bills." After the victim teller hesitated to comply, MADISON reached into his waistband, implying that he possessed a firearm in order to threaten the teller with force, violence, and fear of injury. The victim teller, believing that MADISON was armed with a firearm, complied and placed \$3,448.10 in a book bag provided by MADISON, and MADISON then left the scene. The Hammond Police Department determined that MADISON fled in a white in color Dodge Avenger bearing Louisiana license plate #632 BCS, registered to a T***** Madison of 2808 Clara Street, New Orleans, Louisiana, 70115. Subsequent investigation determined that T***** Madison had a brother named Terry MADISON, III, whose appearance matched the robber seen on surveillance video. A social media site for MADISON named "Terry Beenhavinshxt" depicted MADISON standing in front of the same Dodge Avenger. During the robbery, MADISON was wearing a red hat, denim jacket, red and black striped pants, and carrying a black back pack that officers later determined had been stolen from the Walmart immediately preceding the robbery. MADISON also deposited \$1,877.00 in cash to his personal bank account one hour after the robbery, and was attired in the same clothes from the robbery in bank surveillance footage. Detectives in this case presented the victim teller a photo lineup in which the victim teller positively identified MADISON as the robber.

Limited Nature of Factual Basis


This proffer of evidence is not intended to constitute a complete statement of facts known by

AUSA mf
 Defendant TM
 Defense Counsel vuy


the government and/or Terry MADISON, III. 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 the plea of guilty to the charged offense by MADISON.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from members of state law enforcement agencies and Special Agents and forensic examiners from the Federal Bureau of Investigation, and admissible, tangible exhibits in the custody of the FBI.

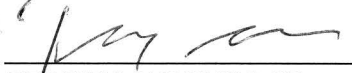
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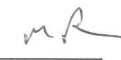
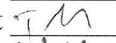
VALERIE JUSSELIN [date]
Counsel for TERRY MADISON, III



MYLES RANIER [date]
Assistant United States Attorney



TERRY MADISON, III [date]
Defendant

AUSA 
Defendant 
Defense Counsel 