UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 08-173

v. * SECTION "J"

SANDRA F. FRANCOIS * VIOLATION: 18 U.S.C. § 1711

* * *

FACTUAL BASIS

The government will prove beyond a reasonable doubt through competent evidence consisting of witness testimony and documentary exhibits that the following establishes a sufficient factual basis for the crimes to which defendant, **SANDRA F. FRANCOIS**, has agreed to plead guilty, as follows:

United States Postal Service (USPS)--Office of Inspector General Agents will testify that on or about on March 4, 2008, the USPS Agent assigned to investigate this matter obtained a copy of a United States Postal Service Money Order No. 9334522959, which had been imprinted on November 20, 2007, at the Paulina, Louisiana, United States Post Office in the amount of \$800. The money order was cashed on December 5, 2007, at a post office in Baton Rouge, Louisiana. The name "Sandra F. Francois" appears in the payor section along with an address and driver's license

number. The USPS Agent verified that the driver's license number written on the back of the money order belonged to a person named "Sandra F. François."

On March 7, 2008, USPS Agents interviewed the officer in charge (OIC) at the Paulina United States Post Office. The OIC will testify that during a routine audit, she discovered that the block of money orders containing number 9334533959 had not been issued. In addition, she determined that one block of money orders had been opened and five consecutive money orders (9334522959 through 9334522963) were missing. The OIC called the help desk and was informed that money order no. 9334522959 had been cashed in December of 2007 and it was imprinted at the Paulina Post Office on November 20, 2007.

The OIC will testify that she advised the USPS Agents that the defendant, **SANDRA F. FRANCOIS**, was employed as a sales and service distribution associate at the Paulina Post Office during the time period in question.

On March 7, 2008, USPS Agents interviewed **SANDRA F. FRANCOIS** at the Paulina Post Office. The defendant executed a *Miranda* rights form and gave a statement. After the USPS Agents showed the defendant a photocopy of the money order in question, **SANDRA F. FRANCOIS** admitted that she had been having financial problems in 2007 and needed the money. The defendant stated that she could not remember the day that she took the money order from the safe and advised the USPS Agents that she only took one money order from the block. **SANDRA F. FRANCOIS** admitted that she imprinted the money order at the Paulina Post Office and cashed it in Baton Rouge at the post office on Government St. **SANDRA F. FRANCOIS** identified her handwriting and driver's license number on United States Postal Service Money Order No. 9334522959 and initialed and dated the photo copy. **SANDRA F. FRANCOIS** also signed a written

statement.

In support of the testimony, the government would also introduce into evidence copies of

United States Postal Service Money Order No. 9334522959 bearing the defendant's signature, which

was initialed and dated by SANDRA F. FRANCOIS during her interview with USPS Agents on

March 7, 2008, the executed Miranda form signed by the defendant on March 7, 2008, and a copy

of the defendant's written statement.

SANDRA F. FRANCOIS (Date) Defendant

EDWARD J. RIVERA (Date) Assistant U. S. Attorney

ROMA KENT (Date)

Counsel for Defendant