

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 17-80068-CR-BLOOM

UNITED STATES OF AMERICA

v.

EVELYN RAMONA PRICE,

Defendant.

FACTUAL PROFFER

The United States of America, Evelyn Ramona Price, hereinafter referred to as the “defendant” or “PRICE”), and his counsel agree that, had this case proceeded to trial, the United States’ evidence would have shown, beyond a reasonable doubt, that, among other things:

1. For all circumstances in this factual proffer, PRICE was a letter carrier for the United States Postal Service (USPS), delivering mail on Route C017 in zip code 33496, in the City of Boca Raton, in the Southern District of Florida. Further, PRICE is a public official.

2. On October 27, 2016, PRICE attempted to deliver a package with tracking number 9505-5101-2357-6299-0517-66 to the listed addressee: Sylvia Wynstein, 18002 Lake Azure Way, Boca Raton, FL 33496. The address is within “The Oaks” community. The return address was KNS LLC 667, E. 87 St, Brooklyn, NY 11236, however the package was postmarked from California. The Oaks business office would not allow the delivery nor accept the package because Sylvia Wynstein was not an owner or tenant at the listed address.

3. Upon returning to the post office, Federal agents interviewed PRICE after waiving her *Garrity* warnings. PRICE stated that she met a man known only to her as “Steve,” in June 2016. PRICE gave Steve addresses from her route and was paid fifty (\$50) dollars USD for

package she delivered to those addresses. Steve would call PRICE the morning the packages were expected at the post office, and let her know where he would meet her, usually at the Veterinary Hospital or Publix supermarket near her route, accept and pay off PRICE for the packages. PRICE said that Steve did not provide her the tracking numbers to the packages, nor did she track any of the packages herself. PRICE stated she recognized the packages because the boxes were always the same size and in the handwriting. PRICE advised she received at least one or two packages per month since June 2016. PRICE gave all the packages to Steve for cash payments, except for the initial delivery of two packages. Despite never being advised as to the contents of the packages, PRICE stated, "I figured it was some kind of drugs, but I don't know what drugs."

PRICE advised there were in fact four (4) packages she intended to deliver to Steve for cash payment at the Veterinary Hospital on October 27, 2016. However, Steve called off their meeting that morning. PRICE advised Steve told her something was not right, and to deliver the packages to the addresses written on the boxes. PRICE did as she was instructed, and delivered the packages to the assigned addressees.

The addresses on the three (3) other packages, were all of residences where PRICE knew no one would physically accept them. All four (4) packages, recovered by federal agents, contained return addresses from New York or Florida, but postmarked from California. Each package was similar in shape, weight, and handwriting. Pursuant to the execution of a lawfully obtained search warrant, marijuana was found inside each package. The total weight of the marijuana was 9186.6 grams.

The defendant understands and agrees that were this matter to have proceeded to trial, the United States would have proven the following elements beyond a reasonable doubt as to Count

One of the Indictment, which charges the defendant with bribery of a public official in violation of Title 18, United States Code, Section 201(b)(2)(C):

First: the Defendant was a public official;

Second: the Defendant received or accepted, or agreed to receive or accept either personally or for another person or entity, something of value; and

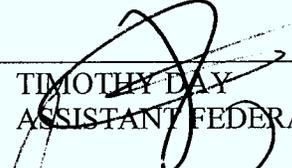
Third: the Defendant did so knowingly and corruptly in return for being induced to violate the Defendant's lawful duty by failing to do some act.

BENJAMIN G. GREENBERG
ACTING UNITED STATES ATTORNEY

Date: 6/30/17

By: 
GREGORY SCHILLER
ASSISTANT UNITED STATES ATTORNEY

Date: 6/30/17

By: 
TIMOTHY DAY
ASSISTANT FEDERAL PUBLIC DEFENDER

Date: 6/30/17

By: 
EVELYN RAMONA PRICE
THE DEFENDANT