

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

WILLIE ESTRELLA

Cr. No. 1:24-CR-044-4

SENTENCING MEMORANDUM OF THE UNITED STATES

Comes now the United States of America, by Julie M. White, Assistant United States Attorney for the District of Rhode Island, and hereby files a sentencing memorandum in support of a sentence of twelve months of incarceration in the above-captioned matter. The PSR sets forth Defendant's total offense level as eleven and he falls within criminal history Category I, which results in an advisory guideline range of eight months to fourteen months. *See* PSR ¶ 95.

Defendant's conduct – using his position of trust as a United States Postal Service employee to steal mail from the facility – justifies a sentence of twelve months' imprisonment, and this recommendation honors the commitment agreed upon in the written plea agreement. ECF 36, p.2a. As set forth below, such a sentence properly reflects the factors referenced in 18 U.S.C. § 3553(a), in that it adequately addresses Defendant's conduct, reflects the nature of the offense, and provides a deterrent effect.

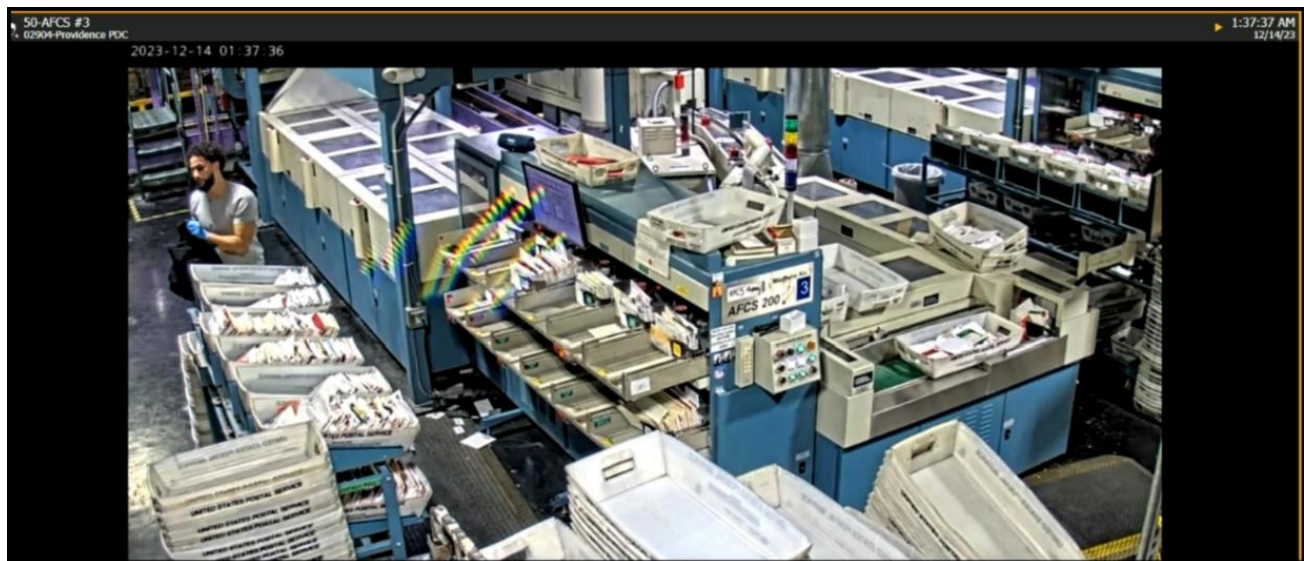
Nature and Circumstances of the Offense

Defendant was seasonally employed as a U.S. Postal Service Mail Processing Clerk during December 2023. A robust investigation by the U.S. Postal Service – Office of Inspector General revealed an ongoing, lengthy employee-driven conspiracy to steal the U.S. mail. Furthermore, the investigation revealed that Defendant began working at the facility in December 2023, and almost

immediately he began to steal mail as part of the conspiracy.

During his shifts at the mail distribution center in Providence, Rhode Island, Defendant and his co-conspirators concealed the mail in their backpacks and removed it from the distribution center. Defendant and co-conspirators then met at a pre-determined location after work to open the mail, remove the cash, gift cards, and checks, and divide the proceeds amongst themselves. This conduct occurred multiple times per week. In total, during the window of Defendant's participation in the conspiracy, over \$95,000 of cash, gift cards, and checks were illegally removed from the U.S. mail stream and stolen by Defendant and his co-conspirators.

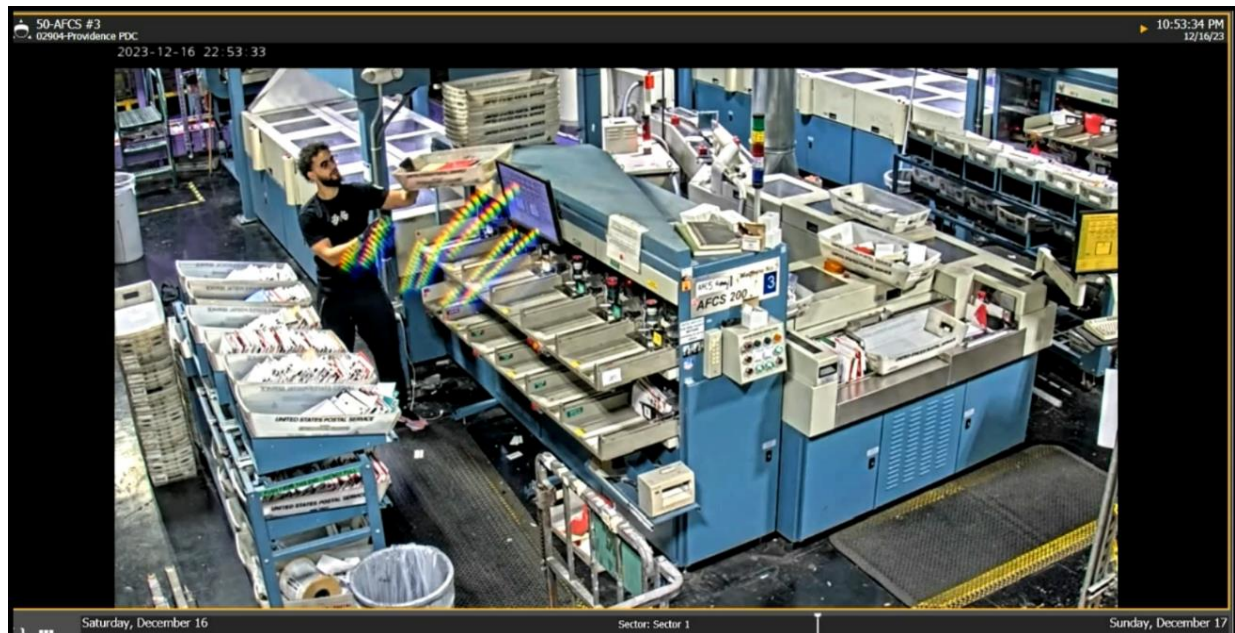
Surveillance footage from the mail distribution center portrays the flagrant misconduct of Defendant and his co-conspirators. The still photograph below, taken from surveillance footage, shows Defendant moving a backpack full of stolen mail on December 14, 2023.



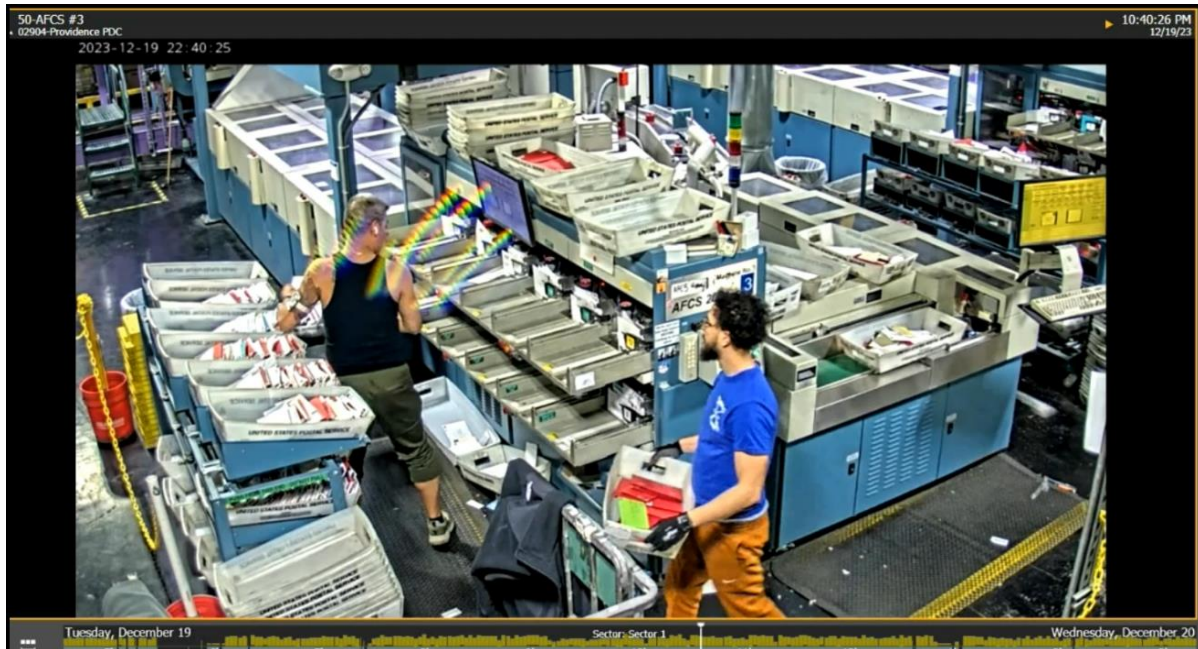
The photograph below, taken from surveillance footage on December 15, 2023, shows Defendant removing a tray of sorted cards to conceal the cards in his backpack for removal from the facility.



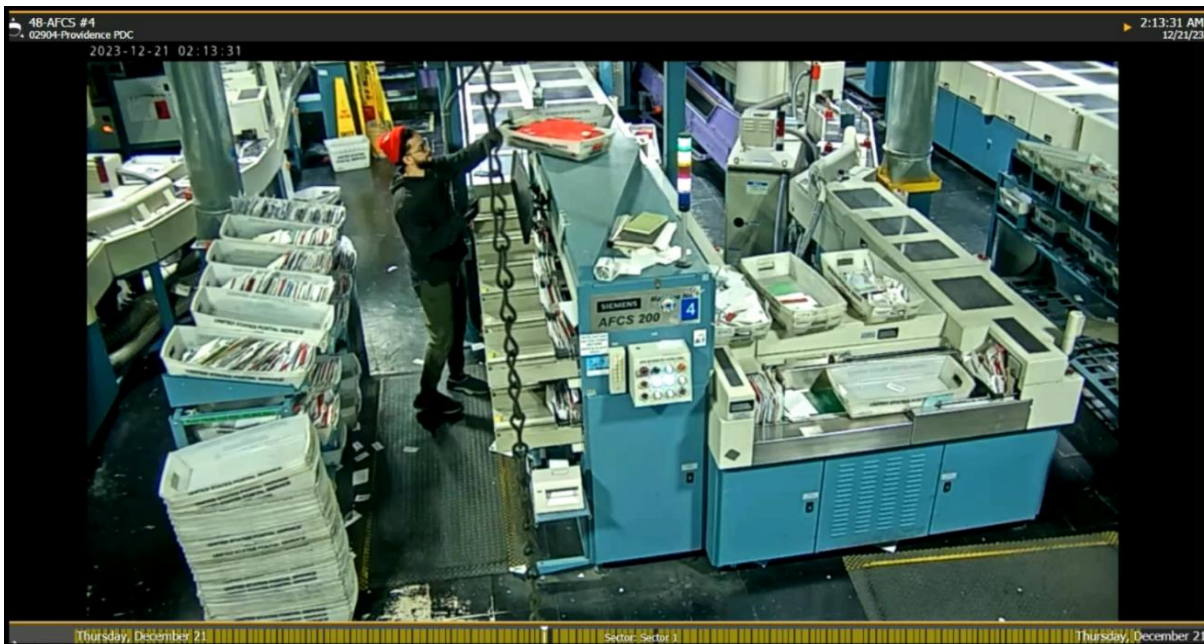
The photograph below, taken from surveillance footage on December 16, 2023, shows Defendant removing a tray of sorted cards to conceal them in his backpack for removal from the facility.



Surveillance footage from December 19, 2023, shows Defendant carrying a tray of specially sorted mail to pass it over to a co-conspirator (depicted in the photograph below).



Surveillance footage from December 21, 2023, surveillance footage shows Defendant removing a tray of specially sorted mail (shown in the photograph below).



Surveillance footage from December 23, 2023, surveillance footage shows Defendant removing a tray of specially sorted mail (shown in the photograph below).



As captured in these still photographs and born out in the surveillance video footage, Defendant's actions were bold, decisive, and inexcusable. Having been employed with the U.S. Postal Service less than two weeks, Defendant is caught on camera blatantly engaging in theft of mail. This illegal conduct occurs multiple times in the month Defendant was entrusted with employment at the postal service.

Analysis of Defendant's cell phone text messages further solidifies Defendant's role in the conspiracy. Below is a series of messages sent between Defendant and a co-conspirator on January 17, 2024 (after his employment with the postal service terminated):

CO-CONSPIRATOR: That's good Yea I've been collecting, I got some stuff for ya.

Ok, cool, u hear back from the people? Let's meet tomorrow cause, my son got a half day today

DEFENDANT: Yeah or I'll pull up on you so we get working quick i got people waiting

DEFENDANT: N fuck that nigga he was a spuff dude never paid once on a collab w him i rather just charge em the 100 a slip instead of waiting to get paid

DEFENDANT: We make way more of cards and faster checks are good but he has mad request to buy em certain amt certain bank like we don't make these shits Im explains to em kids just hard to work with

CO-CONSPIRATOR: Ok ill get em together Oo I see, yea we can't predict what we gonna get. But if we can get a 100 a slip that will work cause we can give good volume that way

DEFENDANT: Yeah only thing is now he wants em to be 15k+ only which is still easy they come in the white slips

DEFENDANT: Yeah get em together I'll pull up on you rq so we start making plays

DEFENDANT: Ang got me a few good ones he cashed em out yesterday for 500

DEFENDANT: I'll show you them when we link

On February 13, 2024, a second co-conspirator was caught with approximately 300 business checks concealed in his backpack. When questioned, the co-conspirator admitted that Defendant took all of the stolen checks the team recovered from the mail. Defendant used a source in New Jersey to profit off the stolen checks.

Defendant was subsequently charged by federal complaint with Conspiracy to Steal Mail in violation of 18 U.S.C. § 371, and Theft of Mail by Postal Employee in violation of 18 U.S.C. § 1709. A federal grand jury sitting in the District of Rhode Island then returned an indictment charging Defendant with the same violations. On October 18, 2024, a two-count information was filed for the purposes of a plea.

History and Characteristics of Defendant

Defendant is 32 years of age and stands convicted of Conspiracy and Theft of U.S. Mail. He has previously received the benefit of a probation before judgement in 2012 for a marijuana

case in the state of Maryland. *See* PSR ¶ 41. Defendant describes his childhood as extremely difficult, leading him to make poor decisions. *See* PSR ¶¶ 44, 46, 47, 69. Defendant reports a history of substance abuse, including marijuana, alcohol, cocaine, and opiates. *See* PSR ¶¶ 72-75. His alcohol use continues to the present but appears to be social in nature. *See* PSR ¶ 73.

After a narcotics related arrest, Defendant made the decision to get his life back on track – he worked to form positive relationships with his family and make changes to his life. *See* PSR ¶ 48. He appears to have familial support in the form of a long-term girlfriend. *See* PSR ¶¶ 54-55. Defendant speaks two languages and demonstrates a history of gainful employment. *See* PSR ¶¶ 79, 83-87.

Betrayal of Trust

Tracing its origins back to 1775, the United States Postal Service has been a steadfast symbol of America. Its mission is straightforward – “[t]o serve the American people and, through the universal service obligation, bind our nation together by maintaining and operating our unique, vital and resilient infrastructure” and “[t]o provide **trusted, safe and secure** communications and services between our Government and the American people, businesses and their customers, and the American people with each other.”¹ The postal service prides itself on serving as a trusted face of the United States government, providing all Americans with a safe form of communication.² Further, the postal service works to “attract, retain and develop high quality employees.”³

Unfortunately, Defendant and his co-conspirators betrayed the trust given to them by the postal service and the customers it serves. Instead of protecting the mail which was entrusted to

¹ (Emphasis added). United States Postal Service. *About the United States Postal Service*. Retrieved from <https://about.usps.com/who/profile/>.

² *Id.*

³ *Id.*

him, Defendant chose to flagrantly violate his responsibilities and instead steal mail to enrich himself. Defendant's actions were not a one-time mistake or lapse in judgement; instead, the evidence shows that he engaged in this illegal behavior for the entirety of his employment with the postal service, simply to enrich himself and his co-conspirators.

While the PSR notes that there is no identifiable victim, the United States believes every member of our community is affected by Defendant's actions. When the U.S. Postal Service – Office of Inspector General opened a hotline for community members believed to be impacted by this crime, 286 individuals reached out – in just nineteen days. Although impossible to trace with certainty the source of each piece of stolen U.S. currency, that does not negate the negative impact on those who trusted Defendant and his co-workers to safely deliver the U.S. mail to its destinations.

Conclusion

In December 2023, Defendant received the opportunity to contribute a mission and to better himself. Along with a steady paycheck for an honest day's work, there existed the potential for further federal employment. Instead, he abused the trust given to him and stole from the very people he was tasked with serving. For the reasons set forth herein, the United States respectfully requests the Court impose a twelve-month sentence of incarceration to send a clear message to others that this type of crime will not be tolerated in our community.

Respectfully submitted,

SARA MIRON BLOOM
Acting United States Attorney



JULIE M. WHITE
Assistant U. S. Attorney