

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:24mj214
)	
v.)	18 U.S.C. § 1701
)	Obstruction of Mail
ZAIRE NELSON,)	(Misdemeanor)
)	
<i>Defendant.</i>)	

STATEMENT OF FACTS

The United States and defendant, ZAIRE NELSON (“defendant”), agree and stipulate that the allegations set forth in the Criminal Information and the following facts are true and correct, and that had the matter gone to trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. The defendant was employed by the United States Postal Service (USPS) as a city carrier assistant at the Portsmouth Main Post Office in Portsmouth, Virginia from at least September 2023 through April 2024.

2. On or about January 22, 2024, the defendant traveled outside of her assigned route to a Days Inn hotel in Chesapeake, Virginia, and deposited mail that she was entrusted to deliver as part of her job as a U.S. Postal employee into a dumpster.

3. On or about January 23, 2024, the defendant again traveled outside of her assigned route to a Days Inn hotel in Chesapeake, Virginia, and deposited mail that she was entrusted to deliver as part of her job as a USPS employee into a dumpster.

4. On or about January 24, 2024, the defendant traveled outside of her assigned route to a Days Inn hotel in Chesapeake, Virginia, and deposited mail that she was entrusted to deliver

as part of her job as a USPS employee into a dumpster.

5. In total, the defendant deposited more than 2,150 pieces of mail into the dumpster, including four absentee election ballots and three opened greeting cards.

6. The defendant never delivered the mail items to their intended recipients.

7. As set forth above, between and on or about January 22, 2024, through on or about January 24, 2024, in the Eastern District of Virginia, defendant knowingly and willfully obstructed and retarded the passage of the mail.

8. This Statement of Facts includes those facts necessary to support the plea agreement between defendant and the United States. It does not include each and every fact known to defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding defendant's case.

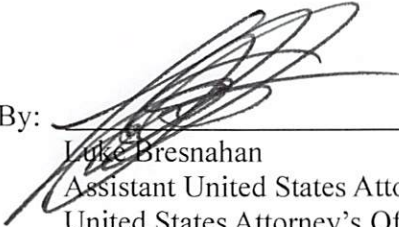
9. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

JESSICA D. ABER
United States Attorney


Date: Jan. 14, 2025

By: _____


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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, ZAIRE NELSON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



ZAIRE NELSON
Defendant

I am ZAIRE NELSON's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



Rodolfo Cejas
Counsel for the Defendant, ZAIRE NELSON