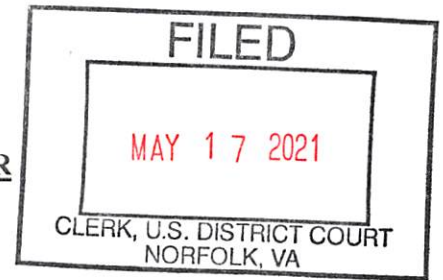


**AFFIDAVIT IN SUPPORT OF APPLICATION FOR  
ISSUANCE OF ARREST WARRANT**



I, Jessica R. Farrell, being duly sworn, hereby depose and state:

1. I have been employed as a Special Agent for the United States Postal Service, Office of Inspector General (USPS OIG) since July 2014. I am currently assigned to the Capital Metro Area Field Office, Richmond District, and domiciled in Chesapeake, Virginia. I am responsible for investigating narcotics violations involving Postal Service employees. I have completed 12 weeks of basic investigative training, which included various aspects of federal law enforcement training related to the investigation of narcotics related offenses. I have also completed the USPS OIG's narcotics training course. Prior to joining the USPS OIG, I was employed as a Special Agent for the Naval Criminal Investigative Service (NCIS) from November 2005 to July 2014. From 2008 to 2012, I worked in a special operations unit focusing primarily on narcotics investigations. Additionally, I completed an advanced training course at the federal law enforcement training center focused on undercover operations and narcotics investigations. Throughout my tenure as a law enforcement officer, I have participated in numerous narcotics related operations, search warrants, and arrests.

2. I make this affidavit in support of an application for an arrest warrant for GARY KENT TURNER, JR. for Bribery of a Public Official in violation of Title 18, United States Code, Sections 201(a) and (b)(2) occurring in the Eastern District of Virginia (EDVA) and elsewhere.

3. The facts and information contained in this affidavit are based on my personal knowledge as well as that of the other agents and law enforcement officials involved in this investigation. All observations that were not made personally by me were related to me by the persons who made the observations. Sources of information used routinely in this process include verifying zip codes through an internal database maintained by the U.S. Postal Service

*JRF*

and checking associations between names and addresses in a database used by law enforcement named ACCURINT. This affidavit contains only that information necessary to establish probable cause in support of an arrest warrant for GARY KENT TURNER, JR., for the crime listed above. This affidavit is not intended to include each, and every fact and matter observed by or made known to agents of the government.

**FACTS AND CIRCUMSTANCES**

4. In October 2019, the investigative team comprised of Special Agents from USPS OIG, and Inspectors from U.S. Postal Inspection Service (USPIS), began investigating Gary TURNER, USPS City Carrier in Norfolk, Virginia, for possible employee collusion. The OIG regularly reviews USPS databases for large numbers of suspected drug parcels destined for single USPS letter carrier routes, which can be an indication of carrier collusion in drug conspiracies.

5. Beginning in May 2019, numerous suspected drug parcels destined for TURNER's route were identified. Covert cameras installed in TURNER's postal vehicle as well as video surveillance obtained from a private parking garage at 201 West 21<sup>st</sup> Street, Norfolk, Virginia, (the first stop on TURNER's route) revealed TURNER meeting with a white male at various locations along his route. Law enforcement database inquiries identified the second individual as "MC" of Portsmouth, Virginia. During these meetings, surveillance footage showed TURNER providing MC with packages, MC providing TURNER with white envelopes of cash, or TURNER counting the cash and putting it in his pocket. From November 2019 to May 2020, surveillance footage captured portions of TURNER's meetings with MC to exchange suspected narcotics parcels and cash on approximately fifteen occasions as follows:<sup>1</sup>

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<sup>1</sup> All chronological times are approximate, and all events occurred at various locations on or near

- (1) On November 25, 2019, at 11:14 a.m., TURNER provided MC with one parcel inside the West 21<sup>st</sup> Street garage. At 11:52 a.m., TURNER was observed counting cash from a white envelope. USPS business records reflected one parcel originating from Los Angeles, California addressed to 1311 Redgate Avenue, Norfolk were scanned as “arrival at unit” that day. The parcel never received a delivery scan.
- (2) On November 27, 2019 at 10:02 a.m., TURNER provided MC with several parcels in exchange for an envelope of cash which TURNER later counted and put in his pocket. USPS business records reflect five parcels originating from Santa Ana, California addressed to 1311 Redgate Avenue, Norfolk. None of the five parcels received a delivery scan.
- (3) On December 26, 2019, at 10:00 a.m., TURNER provided MC with several parcels inside the West 21<sup>st</sup> Street garage. At 10:27 a.m., TURNER opened an envelope of cash which he counted and put in his pocket. USPS business records reflect seven parcels originating from Santa Ana, California addressed to 1319 Redgate Avenue, Norfolk. None of the seven parcels received a delivery scan.
- (4) On December 28, 2019, at 9:42 a.m., TURNER provided MC with one parcel inside the West 21<sup>st</sup> Street garage. At 10:01 a.m., TURNER opened an envelope of cash which he counted and put in his pocket. USPS business records reflect one parcel originating from Santa Ana, California addressed to 1319 Redgate Avenue, Norfolk. The parcel never received a delivery scan.
- (5) On January 27, 2020, at 11:23 a.m., TURNER counted cash from an envelope and put it in his pocket. USPS business records reflect one parcel originating from Los Angeles, California addressed to 1311 Redgate Avenue, Norfolk. The parcel did not receive a delivery scan.
- (6) On February 8, 2020, at 9:49 a.m., TURNER provided MC with three parcels inside the West 21<sup>st</sup> Street garage; USPS business records reflect three parcels originating from Los Angeles, California addressed to 1311 and 1329 Redgate Avenue, Norfolk. None of the parcels received a delivery scan.
- (7) On February 10, 2020, at 10:39 a.m., TURNER retrieved two parcels from a co-worker’s vehicle inside the 21<sup>st</sup> Street garage. TURNER’s co-worker was later identified as “KA”. USPS business records reflect two parcels originating from Los Angeles, California addressed to 1311 Redgate Avenue, Norfolk. Neither of the parcels received a delivery scan.
- (8) On February 24, 2020, at 11:54 a.m., MC retrieved with two parcels from TURNER’s postal vehicle and left an envelope on the driver’s seat; at 2:49 p.m., TURNER counted cash from the envelope and put it in his pocket.

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TURNER’s letter carrier route in Norfolk, Virginia within the Eastern District of Virginia.



- (9) On March 2, 2020, at 10:02 a.m., TURNER provided MC with two parcels at the W. 21<sup>st</sup> Street garage; USPS business records reflect two parcels originating from Los Angeles, California addressed to 1311 Redgate Avenue, Norfolk. Neither of the parcels received a delivery scan.
- (10) On March 6, 2020, at 10:08 a.m., MC collected three parcels from TURNER's vehicle. At 10:48 a.m., TURNER is seen opening an envelope and counting cash. USPS business records reflect three parcels originating from Los Angeles, California addressed to 1321 Redgate Avenue, Norfolk. Neither of the parcels received a delivery scan.
- (11) On March 9, 2020 at 1:32 p.m., TURNER counted cash from an envelope and put it in his pocket.
- (21) On April 1, 2020, at 11:22 a.m., TURNER provided MC with three parcels in exchange for an envelope. USPS business records reflect three parcels originating from Los Angeles, California addressed to 1329 Redgate Avenue, Norfolk. None of the parcels received a delivery scan.
- (12) On April 4, 2020, at 10:29 a.m., in the vicinity of East 18<sup>th</sup> Street and Granby Street in Norfolk, MC collected a parcel from TURNER's vehicle and gave him an envelope of cash. USPS business records reflect one parcel originating from Los Angeles, California addressed to 1329 Redgate Avenue, Norfolk. The parcel never received a delivery scan.
- (13) On April 10, 2020, at 11:17 a.m., in the vicinity of Granby Street and 27<sup>th</sup> Street in Norfolk, TURNER provided MC with a parcel in exchange for an envelope; TURNER is later seen counting cash at 11:21 a.m. USPS business records reflect one parcel originating from Los Angeles, California addressed to 2609 Granby Street, Norfolk. The parcel never received a delivery scan.
- (14) On April 22, 2020, at 1:58 p.m., MC collected five parcels from TURNER's vehicle in exchange for a white envelope. USPS business records reflect five parcels originating from Santa Ana, California addressed to 1327 Redgate Avenue, Norfolk. The parcels never received a delivery scan.
- (15) On April 23, 2020, at 10:15 a.m., MC collected a parcel from TURNER's vehicle and left an envelope. USPS business records reflect one parcel originating from Los Angeles, California addressed to 1327 Redgate Avenue, Norfolk. The parcel never received a delivery scan.
- (16) On April 29, 2020, at 1:17 p.m., in the vicinity of 222 West 21<sup>st</sup> Street in Norfolk, TURNER provided MC with a parcel. USPS business records reflect one parcel originating from Los Angeles, California addressed to 2601 Granby Street, Norfolk scanned as "delivered" that day.

- (17) On May 6, 2020, at 12:17 p.m., MC collected a parcel from TURNER's vehicle. USPS business records reflect one parcel originating from Los Angeles, California addressed to 2601 Granby Street, Norfolk.
- (18) On May 18, 2020, physical surveillance of TURNER's co-worker, KA, revealed KA scanning several packages as "delivered" in the vicinity of 1329 Redgate Avenue, Norfolk, but failing to deliver them to the address, which appeared to be vacant.<sup>2</sup> USPS business records reflect three parcels originating from Los Angeles, California addressed to 1329 Redgate Avenue, Norfolk scanned as "delivered" that day.
- (19) On May 28, 2020, at 11:00 a.m., Turner scanned images on his cell phone while in front of 2601 Granby Street, Norfolk, but did not deliver any parcels at that time. At 11:16 a.m., TURNER opened an envelope and counted two stacks of cash. USPS business records reflect two parcels originating from Los Angeles, California addressed to 2601 Granby Street, Norfolk scanned as "delivered" that day. The delivery scans occurred at 11:01 a.m.

6. TURNER was often observed communicating on his cell phone immediately before and after delivering the parcels to MC. Cellular telephone toll records obtained from AT&T and Sprint revealed numerous incoming and outgoing calls between MC and TURNER from July 12, 2019, to March 16, 2020.

7. On May 21, 2020, an analysis of parcels destined for TURNER's route identified a parcel also destined for 2601 Granby Street, Norfolk, Virginia 23517. The parcel matched the address and description of previous parcels believed to have been handed off to MC in exchange for cash. The parcel was subsequently seized from the mail stream and a federal search warrant was obtained to identify the contents of the parcel. On May 27, 2020, the parcel was opened and found to contain approximately three and a half pounds of marijuana. The suspected marijuana was properly packaged and vouchered and sent to the U.S. Postal Service Forensic Laboratory for analysis which returned as 3 pounds 5.5 ounces of marijuana.

8. On June 16, 2020, three additional parcels suspected to contain marijuana were destined

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<sup>2</sup> I believe that "KA" had some involvement in this activity because many of the parcels were destined for her route.

for TURNER's route. On June 17, 2020, the investigative team conducted surveillance of TURNER as he delivered two suspected narcotics parcels to MC in the parking garage of 201 West 21<sup>st</sup> Street, a distance away from the intended delivery address. MC was then observed returning to his residence.

9. On June 18, 2020, the investigative team, and the Norfolk Police Department (NPD) conducted surveillance of TURNER as he delivered the third parcel to MC near the intersection of Omohundro Avenue and West 22<sup>nd</sup> Street in Norfolk, a distance away from the intended delivery address. NPD officers engaged in a consensual conversation with MC as he exited the Dollar Tree, on West 21<sup>st</sup> Street. MC admitted to being in possession of marijuana and was subsequently placed under arrest. A search of his vehicle revealed a .380 pistol and a small backpack containing \$11,769 in U.S. currency, in addition to approximately three pounds of marijuana located inside the parcel previously received from TURNER. The suspected marijuana was properly packaged and vouchered and sent to the Commonwealth of Virginia Department of Forensic Science. A certificate of analysis was returned confirming the presence of marijuana. A state search warrant executed on MC's residence revealed additional quantities of marijuana, packaging materials and scales.

10. Later on June 18, 2020, the investigative team stopped and temporarily detained TURNER while he delivered mail on his route. During a post Miranda interview, TURNER admitted to receiving money in exchange for the parcels he delivered to MC, however he said it was only a few dollars to buy himself a meal. TURNER was released to Postal Service management at the scene and placed on immediate suspension.

11. On June 23, 2020, two additional parcels addressed to (no name), 2600 Granby Street, and (no name) 2609 Granby Street, were turned over to postal investigators by the supervisor at

TURNER's station. The parcels matched the profile of previous parcels originating in Los Angeles, California and received by MC from TURNER. A narcotic detection canine made positive alerts on the suspect parcels, indicating the presence or odor of narcotics. On June 29, 2020, federal search warrants were executed on the two parcels. The parcels were found to contain 2.25 pounds of suspected marijuana and 6.7 pounds of suspected THC edibles.

12. In early March 2021, a confidential source provided the following information to members of the investigative team: in 2017 MC began using various Postal Service employees to facilitate his marijuana distribution operation. In late 2018, MC began working solely with TURNER. MC paid TURNER \$100 for each marijuana parcel that TURNER delivered to him (estimated total payments were \$2,000 to \$3,000 per month). TURNER provided MC with addresses where he could have the marijuana parcels mailed. TURNER was aware that MC used and sold marijuana. On one occasion, TURNER introduced MC to a friend for the purpose of buying marijuana from MC.

13. In December of 2020, I contacted the following residents and/or owners of addresses frequently used on the suspect packages described above:

- (a) 1323 Redgate Avenue – the business owner said he began the lease there on October 15, 2019. He said he does not have packages delivered to that location and has never received any packages from California there.
- (b) 1325 Redgate Avenue – the business owner said he does not have any packages delivered there and has never received any packages from California.
- (c) 1329 Redgate Avenue – I attempted to contact the owner of this address but received no response.
- (d) 1311 Redgate Avenue – this address does not exist. A fitness business appears to occupy 1309 to 1313 Redgate Avenue, however the physical address for the business is 1313 Redgate Avenue.
- (e) 2600 Granby Street – the manager of a clothing boutique at this address confirmed that she leased the unit in March 2020. Between March and July of

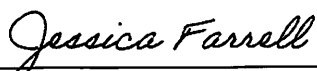
2020 the location was being renovated and during that time she did not receive any packages delivered there and has never received any packages from California. The owner of the property stated that prior to renting it to the clothing store manager, he used the property to store antiques. He also confirmed that no mail or parcels were delivered to that location, and he did not receive any packages from California.

- (f) 2601 Granby Street – this building contains several suites occupied by approximately five small businesses, and I was unable to gain access to the interior. Attempts to contact the owner were unsuccessful.

14. Per Postal Service policy, when approached by individuals requesting parcels from their postal vehicle, mail carriers must request identification from the individual and verify that the individual resides at the delivery address. An employee may not accept a gift from an outside source or one given because of the employee’s official position. All customers are considered to be prohibited sources. Accepting cash or cash equivalents is prohibited. On certain occasions, such as Christmas, an employee may accept a non-cash gift valuing no more than \$20 and not to exceed \$50 from one customer in a calendar year. Accepting money from customers for delivering packages is a violation of a mail carrier’s official duties.

Based on the foregoing, I submit that there is probable cause to believe that GARY KENT TURNER, JR., committed a violation of Title 18, United States Code, Sections 201(a) and (b)(2), Bribery of a Public Official, and ask that an arrest warrant be issued.

Further, your affiant sayeth naught.

  
\_\_\_\_\_  
Jessica R. Farrell  
Special Agent  
USPS Office of Inspector General

Read and Approved:

                  /s/                    
\_\_\_\_\_  
Sherrie Capotosto  
Assistant United States Attorney

Sworn and subscribed to before me on this 17th day of May 2021.

  
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UNITED STATES MAGISTRATE JUDGE