UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

CASE NO. 22-20191-CR-WILLIAMS

UNITED STATES OF AMERICA,		
Plaintiff,		
v.		
OLEANVINE PICKERING MAYNARD,		
Defendant.	,	

NOTICE OF FILING LETTERS IN SUPPORT OF SENTENCING

Defendant, Oleanvine Pickering Maynard, through counsel, respectfully submits for the Court's consideration the attached letters of support in advance of her sentencing hearing.

Respectfully Submitted,

MICHAEL CARUSO FEDERAL PUBLIC DEFENDER

BY: s/R. D'Arsey Houlihan

R. D'Arsey Houlihan Supervisory Assistant Federal Public Defender Florida Bar No. 100536 150 W. Flagler Street, Suite 1700 Miami, Florida 33130-1556 (305) 530-7000

E-Mail: <u>d'arsey_houlihan@fd.org</u>

CERTIFICATE OF SERVICE

I HEREBY certify that on **August 14, 2023**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/R. D'Arsey Houlihan

James Pickering East End Tortola, British Virgin Islands

July 13th, 2023

Honorable K. Williams Judge Southern District of Florida Miami, FL 33130-1555

Dear Honorable Judge Williams,

I am writing this letter in support of my sister Oleanvine Maynard's behalf who is currently facing drug charges. She has been a very good sister to me and the family. She is a caring and a hard working sister who tried her best to assist the family and any one that she came in contact with. I know my sister to be working in the Government for many years in several departments where she served our country and represented the country on many occasions overseas.

She has made a mistake and I know that she is very sorry for what she has done. I know that the time she is inside, she has reflected on what she did and regretted it.

I am respectfully asking you please to be lenient on my sister with the consequences so that she would be given another chance to show the world she can be that person that everyone knew and loved in the family and in the community.

I am thanking you in advance, Honorable Judge Williams to consider my plea. Please let her come back to her family soon.

Yours sincerely,

James Pickering

James Rekeing

Gloria Donovan East End Tortola, British Virgin Islands

July 13th, 2023

Honorable K. Williams Judge Southern District of Florida Miami, FL 33130-1555

Dear Hon. Williams,

I am writing you this letter in support of my sister Oleanvine Maynard, who is currently facing drug charges before your esteemed court.

Oleanvine is my elder sister and I have known her all my life. During this this, Oleanvine has always been caring, honest and a hard worker. She always looked out for our family because that is the way we were brought up. She was always the one to give family members advice and to keep us together. Oleanvine has also worked in many areas in the Government of the BVI and has always done her best in whichever department she was placed in. All these attributes have made a significant impact to our family and the community in which we live.

I understand the seriousness of the charges brought against my sister. I know she was wrong to do what she did because she knows we were not brought up to do things that are wrong.

Oleanvine has helped so many people in need such as family, friends and even strangers.

She has fed strangers; she has assisted them in finding work, sponsoring several who came from other islands in the Caribbean, to help them to make a better life for themselves. She would always give of herself to assist others whether it was her time or any other way.

I truly believe that my dear sister Oleanvine Maynard is very sorry and understands the seriousness and consequences of her actions. She knows that she has learned from the mistakes that she has made. I am so sure that she regrets all of the past choices that have brought her where she is and is fully committed to making the necessary changes to become the law-abiding and productive member of society she once was.

Hence, I am kindly requesting the court to consider Oleanvine Maynard's positive qualities, her genuine remorse and her commitment to personal growth and improvement. I firmly believe that she still has the potential to contribute positively to the society and an empathetic approach will provide her with the opportunity to rebuild her life to make amends for any wrongdoing.

Thank you so much for your attention and contemplation in my sincere request. Please feel free to contact me if you have any other queries or information.

Respectfully,

Gloria Donovan

Wilton G. Frett

General Delivery, East End, Tortola, British Virgin Islands VG1120

24th July 2023

Honourable K. Williams Judge Southern District of Florida Miami, FL 33130-1555

Dear Hon. Williams:

Re: Character Witness for Mrs. Oleanvine Maynard

My name is Wilton Frett, and I am delighted to write on behalf of my aunt Mrs. Oleanvine Maynard, whom you will sentence. Being the last of four siblings, I have known Mrs. Oleanvine Maynard all my life, as she is my father's (deceased) biological sister.

Aunt Oleanvine is compassionate, loving, and family-oriented. She has always been someone you can talk to about any situation, and she would offer advice and do her best to assist in whatever way she can. What is impressive about my aunt is that even if the situation included one of my friends, she would still try her best to assist them as though it was me.

Aunt Oleanvine always exhibited an open-door policy when it came to family. Whenever my children and I visited her, we never left empty-handed; whether it was offering us something to eat or any food item. She gave whatever little funds she may have had on hand and always encouraged me to save for a rainy day.

My aunt's situation is unfortunate, but I can confidently say that she's God-fearing, has attended church regularly, and is a hard-working and dedicated mother. If you require any further information, I remain available.

Respectfully yours,

Mr. Wilton Frett

Adrian A. Frett

British Virgin Islands

20th July, 2023

Honourable K. Williams Judge Southern District of Florida Miami, FL 33130-1555

Dear Hon. Williams;

Re: Character Witness for Mrs. Oleanvine Maynard

My name is Adrian Frett and I am writing you on behalf of Mrs. Oleanvine Maynard, who you will sentence.

I have known Mrs. Oleanvine Maynard practically all my life as she is my aunt being my father's (now deceased) biological sister.

In describing my aunt's character, I would say that she's loving, caring and willing to go the extra mile to assist.

There are two specific situations, I can speak of where she was there for me and I am forever grateful to her. At a point in my life when I did not have anywhere to live and Aunty Oleanvine opened her home to me, treated me as one of her own and allowed me to stay with her until I was able to find somewhere to live. She had always indicated that I am not a guest, I am family and I could have stayed as long as I needed to. The second situation relates to when my former wife died due to illness, Aunty Oleanvine made an already difficult time seamlessly, where she jumped right in without even being asked and assisted other family members with the funeral arrangements.

Although Aunty Oleanvine's present situation is unfortunate, I still believe my aunt to be a loving and caring person that grew up in the church and is God-fearing. I know her to be loyal and dedicated and enjoys family time as she usual cooks during the holidays and the family would come to her home and spend time.

If you require any additional information, do not hesitate to contact me at the particulars indicated.

Respectfully yours,

Adrian Front (Mr.)

Karisma Maynard
Daughter
East End, Tortola
British Virgin Islands, VG1120

July 15, 2023

Honorable Kathleen Williams
United States District Judge
Southern District of Florida
Wilkie D. Ferguson Jr. US Court House
400 Miami Avenue
Miami, FL 33128

Dear Judge Williams:

My name is Karisma Maynard, and I am writing to you on behalf of my mother, Mrs. Oleanvine Pickering-Maynard, who will be sentenced by you.

I am the only daughter of my mother and my deceased father. My mother has been a huge part of my life since I was born. I cannot remember a day that my mother wasn't there for my children and I before her date of incarceration and even now she still tries her best to keep in touch to make sure we are doing well. Being the only girl child made it difficult for me growing up amongst boys but thankfully I always had my mother there to give her support, motherly advice and encouraging words. We always had a close relationship as we did everything together and spent lots of time with each other.

Despite this unfortunate situation that my mother has fallen into, I have always known her to be a very hard-working, respectable, compassionate, God-fearing, helpful, and giving person. At times, I would ridicule my mother for always trusting and helping people even those that she knew did not like her. However, she would always tell me, "My reward is in Heaven, you must always be good to people." Standing on her words, she was always the kind-hearted one in our family. She would go out of her way to help her siblings, friends and even strangers at anything they required of her. My mother and father were married even before I was born, their

relationship and commitment to each other was a big motivation for me as I grew older. Sadly, that motivation was cut short when I lost my father unexpectedly in 2015. Grieving the loss of her husband of so many years, that did not stop my mother from being the best mother to her children. In fact, this made her an even better mother because now it was left up to her alone to raise the three of us, support us financially and to show us the love we were lacking. In 2012, I made her a grandmother for the first time, and she has been elated ever since. Now, she is a proud grandmother of seven grandchildren, one of whom she has never met yet because of her absence. Nevertheless, she was always a part of their upbringing, attending every event, doctor's appointments, and school activities to show her support. She took care of them all like they were her own children and never once complained. This is the type of person I know my mother to be. She always gave us the best life there was to offer and made sure we were happy. My mother was always the one who carried on the family's tradition during special holidays. All her siblings would call on her in their times of need. Never once has she turned them away or did not try to help. I have seen my mother take strangers and family alike for years into her home and treat them with so much kindness. A deed only a kind-hearted person would do. Although I would express my discernment for her decisions, she still insisted she was just 'trying to help'.

I watched my mother work many late nights and weekends at various jobs from the time we were small children. She spent a lot of her years studying while working. She has held many positions within the Government administration and privately in the British Virgin Islands and abroad. Noting that none of these positions came as an easy task to her, I watched her overcome all her hindrances. A few years ago, for political reasons, my mother was forced to retire from the Government services. After retiring, she decided to open a business of her own to be able to feed her family and pay her bills. As any new business, there were challenges in the beginning. Just as business was picking up, the country suffered the aftermath of Hurricanes Irma and Maria and thereafter the restraints of COVID-19. All these occurrences made it difficult for my mother to sustain the mortgage on her house, continue putting us through college and taking care of her family like any mother should all on her own. I personally had to stop going to university where I was pursuing my bachelor's degree to help ease the strain on my mother until I was able to afford it on my own. Luckily for her, she was able to secure a job after all this but at this point her house was already in jeopardy. I am sure the actions that led her to be before you were acts of

desperation and not of pure intent. This, to me, is the perfect example of poor decision-making. A learning experience even for me.

My mother being incarcerated has taken a heavy toll on me mentally, emotionally, and socially. I have cried so many times and questioned her actions but just cannot come to terms with how we got here. Life has been nothing but a rollercoaster ride since, but I pray to God that one day life will get better again soon. I haven't seen my mother since she left the BVI, and it hurts me so much because I have no other parents and I have never been in this predicament before. Her grandchildren miss her so much and they keep asking when she will return, a question I do not have the answer to yet. My mother was the only person whom I could have counted on to help me with my children and through this life.

Taking into consideration my mother's good character before this incident, with tears in my eyes, I am asking you please, your Honor to be lenient on my mother when sentencing her. I know that she is sorry and regretful of her actions because she tells me so almost every day. I can assure you that her time spent beyond those doors has taught her a valuable lesson. I am also certain that her education, good values, and determination can be of good contribution to the outside world. I want to thank you in advance for your kind consideration towards her sentencing and the possibility for the opportunity for her to reconnect with her family whom she loves so dearly soon. I miss and love her so much!

Sincerely,

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Knayand

Ms. Karisma Maynard

Karissa John Grand-Daughter St. Thomas, USVI, 00803

August 1, 2023

Honorable Kathleen Williams
United States District Judge
Southern District of Florida
Wilkie D. Ferguson Jr. US Court House
400 Miami Avenue
Miami, FL 33128

Dear Judge Williams:

I am the granddaughter of Oleanvine Maynard who I love to call Grandma or my bestie. I am the oldest grandchild, so she is like my second mother. When I learned that my grandma was in jail, I could not control my tears. I was so heartbroken and did not understand how that happened. As time went by and mommy started explaining everything to me, I kind of understood what was happening. I miss my grandma every day I wake up because she was my sleeping partner. We slept together every single night. My grandma is so loving and kind, and she takes really good care of me. We go to church and shopping together and even work together sometimes. Sometimes I cannot function when I think about her. I am asking you please to forgive my grandmother for what she has done because I know she is a good person at heart. She promised me never to get in trouble again and I believe her. I do not know when last I have seen her and I miss her so much. I pray she comes back to us soon. Thank you.

Yours truly,

Knayraid

Ms. Karisma Maynard (Mother) on behalf of Karissa John (Daughter)

August 9, 2023

Judge Kathleen Williams Southern District of Florida Wilkie D. Ferguson Jr. US Court House 400 Miami Avenue Miami Fl 33128

Dear Judge Williams;

I have known Ms. Oleavine Pickering Maynard for at least 40 plus years. She first came to stay with me as we opened our door to her when she came to the USVI dedicated to furthering her education at the university. She was very quiet, respectful, prayerful, hardworking, and extremely focused. To this day she remains the same. As a part of a large family, she has always been the shoulder to lean on and assist in times of need.

Thus, coming from humble beginnings Oleavine remained humble yet driven to do well. In her well-doing she is always willing to share and give of herself or of whatever she can for others. To her detriment at times, she is very trusting and has always had an open door. Whether she knew you well or not it could have been from her one- or two-bedroom apartment with her family, her door was and is always open to many. These are the traits of a person with a rare heart for people and service. This level of kindness you do not experience often.

For all of these reasons above I ask that you show leniency to Oleavine in light of the person that she truly is. Despite this case I know Oleavine Pickering Maynard as a loyal and honorable person to her family, friends, and community.

Sincerely,

Helen T Patrick

Vincent Frett

26th July 2023

Honourable K. Williams Judge Southern District of Florida Miami, FL 33130-1555

Dear Hon. Williams:

Re: Character Witness for Mrs. Oleanvine Maynard

It is with great enthusiasm that I'm writing this letter to ask for your lenience on behalf of my aunt Oleanvine Maynard, the defendant before you. All my life, I have known Aunt Maynard to be an exceptional human being to my siblings and me.

I have always been impressed by Aunt Maynard's dedication to being a hard-working, devoted mother. She goes above and beyond for her children, especially after her husband, her children's father, passed away. I have known her as a well-respected woman and community activist for many years, always putting others before herself.

I feel fortunate to have been raised in the British Virgin Islands by persons such as my aunt, who helped mold me into the man I am today. I can always count on her to advise me on life decisions, as she is one the most resourceful person that I know. Although the current circumstances are regrettable without reservations, Aunt Maynard has made a lasting impression on my life and many others.

Respectfully yours,

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Mr. Vincent Frett