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2 3 4 5 6	RANDY S. GROSSMAN United States Attorney OWEN ROTH California Bar No. 335891 Assistant U.S. Attorney United States Attorney's Office 880 Front Street, Room 6293 San Diego, California 92101-8893 Telephone: (619) 546-7710 Attorneys for Plaintiff UNITED STATES OF AMERICA
7 8	
8	UNITED STATES DISTRICT COURT
10	UNITED STATES OF AMERICA, Case No. 21-CR-3382 AJB
11	UNITED STATES OF AMERICA, Plaintiff, Case No. 21-CR-3382 AJB
12	V.
13	JAMES CHARLES RIVERA,
14	Defendant.
15	
16	IT IS HEREBY AGREED between the plaintiff, UNITED STATES OF AMERICA,
17	through its counsel, Randy S. Grossman, United States Attorney, and Owen
18	Roth, Assistant United States Attorney, and defendant, JAMES CHARLES
19	RIVERA, with the advice and consent of Knut S. Johnson, counsel for
20	defendant, as follows:
21	//
22	11 .
23	11
24	11
25	//
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27	
	OR:11/18/22
	Def. Initials 🥂

I

THE PLEA

A. THE CHARGE

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Defendant agrees to plead guilty to the Superseding Indictment in Criminal Case No. 21-CR-3382 AJB (the "Indictment") charging Defendant as follows:

Count 1

Beginning on a date unknown, and continuing to and until October 8 20, 2021, within the Southern District of California and elsewhere, 9 defendant JAMES CHARLES RIVERA, did knowingly and intentionally conspire 10 and agree with other persons, known and unknown, to distribute anabolic 11 steroids, including but not limited to Anadrol, Anavar (Oxandrolone), 12 Choriomon (hCG), Dianabol (Methandrostenolene), Halotestin, Proviron 13 (Mesterolone), Sustanon, Test E (Testosterone), Tiromel, Turinabol 14 (Dehydrochloro-methyltestosterone), Winstrol (Stanozolol), Schedule III 15 Controlled Substances, and masking agents; all in violation of Title 21, 16 United States Code, Sections 841(a)(1), (b)(1)(E), and 846). 17

Count Two

Beginning on a date unknown, and continuing to and until October 19 20, 2021, within the Southern District of California and elsewhere, 20 defendant JAMES CHARLES RIVERA, did knowingly and intentionally conspire 21 and agree with other persons, known and unknown, to conduct financial 22 transactions affecting interstate or foreign commerce that were the 23 proceeds of specified unlawful activities, to wit: conspiracy to 24 manufacture and to distribute controlled substances, manufacture of 25 controlled substances, and distribution of controlled substances, 26 knowing that the property involved in the financial transactions 27 represented the proceeds of some form of unlawful activity and intending 28

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1 to promote the carrying on of the specified unlawful activity; all in 2 violation of Title 18, United States Code, Sections 1956(h) and 3 1956(a)(1)(A)(i).

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B. PRE-TRIAL DISPOSITION

5 Defendant agrees that, following entry of Defendant's guilty plea, 6 the Government need not hold or preserve any evidence seized in 7 connection with this case. Furthermore, if the court has issued a 8 preservation order in connection with any seized evidence, the Defendant 9 agrees to jointly request that the Court lift or revoke the preservation 10 order following entry of defendant's guilty plea.

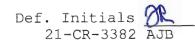
Defendant agrees further as follows: Upon acceptance of Defendant's guilty plea by the District Court, and not withstanding any preservation order(s) entered by the District Court, the Government need not hold or preserve any evidence seized in connection with this case, including but not limited to:

a. Any cellular devices, computers, tablets, and other
hardware or software programs;
b. Any vehicle(s); and
c. Any controlled substance(s), except sample amounts for
confirmatory testing.

21 C. FORFEITURE

Defendant consents to the forfeiture allegations of the Indictment and consents to the forfeiture of all properties seized in connection with the case. The attached forfeiture addendum shall govern forfeiture in this case.

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1	II
2	NATURE OF THE OFFENSES
3	A. ELEMENTS EXPLAINED
4	Defendant understands that the offenses to which Defendant is
5	pleading guilty have the following elements:
6	Count One
7	1. Beginning on a date unknown and continuing through October 20,
8	2021, there was an agreement between two or more persons to
9	distribute federally controlled substances; and
10	2. Defendant joined in the agreement knowing of its purpose and
11	intending to help accomplish that purpose.
12	<u>Count Two</u>
13	1. Beginning on a date unknown and continuing through October 20,
14	2021, there was an agreement between two or more persons to commit
15	money laundering; and
16	2. Defendant joined the conspiracy knowing of its purpose and
17	intending to help accomplish it.
18	B. ELEMENTS UNDERSTOOD AND ADMITTED - FACTUAL BASIS
19	Defendant has fully discussed the facts of this case with defense
20	counsel. Defendant has committed each element of the crimes and admits
21	that there is a factual basis for this guilty plea. The following facts
22	are true and undisputed:
23	1. Beginning on a date unknown and continuing up to and including
24	October 20, 2021, within the Southern District of California, and
25	elsewhere, there were agreements between Defendant and others to
26	knowingly manufacture and distribute controlled substances, in
27	particular steroids; to recoup the proceeds of that distribution
28	activity; and to use proceeds to continue the manufacture and
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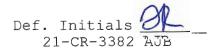
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distribution. Defendant knowingly participated in that activity knowing of the purposes of the agreements and intending to help accomplish them.

- 2. Defendant was a merchant on the "dark web," distributing steroids 4 5 and related pharmaceuticals under the moniker, "JuicePal." Defendant advertised on dark-web steroids forums and maintained a 6 7 website that accepted orders for steroids and pharmaceutical products used to mitigate the effects of steroid use and as masking 8 9 agents. Defendant advertised dozens of these products and accepted 10 payment via both cash and virtual currency. Defendant accepted and fulfilled thousands of orders during the period of the conspiracy, 11 12 and advertised that he had hundreds of satisfied customers. For purposes of this plea agreement, Defendant agrees that he sold more 13 14than 60,000 units of steroids that are controlled on Schedule III 15 of the Controlled Substances Act schedules.
- 3. Defendant accepted and fulfilled orders in at least forty-three states of the United States, and in Canada, the United Kingdom, Germany, Australia, and in locations in the European Union. Defendant accepted orders in the Southern District of California and had those orders fulfilled. Among others, Defendant admits that customers who placed and received orders included at least one professional bodybuilder.
- 4. In connection with this activity, Defendant worked with at least
 four co-conspirators in the United States to conduct domestic
 production and distribution of steroids. Defendant instructed at
 least two co-conspirators on how to encapsulate powder steroids,
 and how to compound raw steroids powders into liquid steroids and



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to package the liquid steroids in vials. Defendant also provided these co-conspirators with manufacturing equipment.

- 5. Defendant ordered steroids powders from China, and ordered materials necessary for production and distribution of steroids (syringes, vials, encapsulation capsules, etc.) and provided them to the co-conspirators who conducted manufacturing. Co-conspirators responsible for bulk manufacturing shipped packages of finished products to co-conspirators responsible for distribution using the U.S. Postal Service. Co-conspirators who manufactured steroids for Defendant also shipped orders to customers directly, at his direction. The co-conspirators fulfilled customer orders, shipping packages of steroids and related pharmaceuticals using the Postal Service. Packages shipped to customers were branded as "JuicePal" products, as labels on vials of steroids and packages of pills, and as stickers in the packages shipped to customers.
- 6. Defendant accepted orders via his dark web merchant website and provided the orders to his domestic co-conspirators to fulfill. These co-conspirators, acting at Defendant's direction, mailed packages to customers. Customers, in turn, paid Defendant with virtual currency, or by mailing cash to the co-conspirators. When the co-conspirators received cash from customers, Defendant had them remit it to him, and often kept a portion as compensation for their participation in the scheme. Defendant and his coconspirators carried out this distribution scheme by using a series of P.O. Boxes that they opened and operated using false identification.
- 7. Defendant agrees that the Government can prove the scheme took in no less than 450.974 BTC (Bitcoin). Defendant further agrees that

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1 during the period of the scheme, the value of Bitcoin was as low 2 as \$3,183 per BTC (in December 2018) and as high as \$60,883.80 (in October 2021). Defendant further agrees the Government can prove 3 he expended between \$250,001 and \$549,999, in cash, to promote and 4 further the distribution scheme. Defendant used proceeds from the 5 6 scheme to perpetuate the steroids distribution activity. Among 7 other things, Defendant used proceeds from the scheme to pay for advertising and marketing of the merchant website on the dark web; 8 9 to pay co-conspirators for their participation in the scheme; to 10 pay for ingredients to produce steroids; to pay for shipping costs; 11 and other costs inherent in the production and distribution scheme. 12 For purposes of this plea agreement, the parties agree that 13 Defendant expended between \$250,001 and \$549,999 of proceeds to 14 promote and further the distribution scheme. 15 III

PENALTIES

17 The crime to which Defendant is pleading guilty carries the following penalties: 18

Count One

A. A maximum of 10 years in prison 20

21 B. A maximum \$500,000 fine

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C. A mandatory special assessment of \$100 per count 22

23 D. A term of supervised release of at least two years and as long as 24 for life. Failure to comply with any condition of supervised 25 release may result in revocation of supervised release, requiring Defendant to serve in prison, upon revocation, all or part of the 26 statutory maximum term of supervised release. 27

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1	E.forf	eiture of all property, real or personal, involved in such
2	offer	nse, or any property traceable to such property.
3		Count Two
4	Α.	a maximum of 20 years in prison;
5	в.	a maximum \$500,000 fine or twice the value of the property
6		involved in the transaction, whichever is greater;
7	с.	a mandatory special assessment of \$100 per count.
8	D.	a term of supervised release of not more than five years.
9		Failure to comply with any condition of supervised release may
10		result in revocation of supervised release, requiring
11		Defendant to serve in prison, upon revocation, all or part of
12		the statutory maximum term of supervised release.
13	Е.	forfeiture of all property, real or personal, involved in such
14		offense, or any property traceable to such property.
15		IV
16		DEFENDANT'S WAIVER OF TRIAL RIGHTS
16 17		DEFENDANT'S WAIVER OF TRIAL RIGHTS AND UNDERSTANDING OF CONSEQUENCES
	This	
17	This A.	AND UNDERSTANDING OF CONSEQUENCES
17 18		AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to:
17 18 19		AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to
17 18 19 20	Α.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt;
17 18 19 20 21	А. В.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt; A speedy and public trial by jury;
17 18 19 20 21 22	А. В. С.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt; A speedy and public trial by jury; The assistance of counsel at all stages of trial;
17 18 19 20 21 22 23	А. В. С. D.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt; A speedy and public trial by jury; The assistance of counsel at all stages of trial; Confront and cross-examine adverse witnesses;
17 18 19 20 21 22 23 24	А. В. С. D.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt; A speedy and public trial by jury; The assistance of counsel at all stages of trial; Confront and cross-examine adverse witnesses; Testify and present evidence and to have witnesses testify on
17 18 19 20 21 22 23 24 25	А. В. С. D. Е.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt; A speedy and public trial by jury; The assistance of counsel at all stages of trial; Confront and cross-examine adverse witnesses; Testify and present evidence and to have witnesses testify on behalf of defendant; and
17 18 19 20 21 22 23 24 25 26	А. В. С. D. Е.	AND UNDERSTANDING OF CONSEQUENCES guilty plea waives defendant's right at trial to: Continue to plead not guilty and require the Government to prove the elements of the crime beyond a reasonable doubt; A speedy and public trial by jury; The assistance of counsel at all stages of trial; Confront and cross-examine adverse witnesses; Testify and present evidence and to have witnesses testify on behalf of defendant; and Not testify or have any adverse inferences drawn from the

V

DEFENDANT ACKNOWLEDGES NO PRETRIAL RIGHT TO BE PROVIDED WITH IMPEACHMENT AND AFFIRMATIVE DEFENSE INFORMATION

Any information establishing the factual innocence of defendant known to the undersigned prosecutor in this case has been turned over to defendant. The Government will continue to provide such information establishing the factual innocence of defendant.

If this case proceeded to trial, the Government would be required 8 9 to provide impeachment information for its witnesses. In addition, if defendant raised an affirmative defense, the Government would be 10 required to provide information in its possession that supports such a 11 defense. By pleading guilty, defendant will not be provided this 12 information, if any, and defendant waives any right to this information. 13 14 Defendant will not attempt to withdraw the guilty plea or file a collateral attack on the existence of this information. 15

VI

DEFENDANT'S REPRESENTATION THAT GUILTY

PLEA IS KNOWING AND VOLUNTARY

Defendant represents that:

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Defendant has had a full opportunity to discuss all the facts 20 Α. and circumstances of this case with defense counsel and has a 21 clear understanding of the charges and the consequences of 22 this plea. By pleading guilty, defendant may be giving up, and 23 rendered ineligible to receive, valuable government benefits 24 and civic rights, such as the right to vote, the right to 25 possess a firearm, the right to hold office, and the right to 26 serve on a jury. The conviction in this case may subject 27 defendant to various collateral consequences, including but 28

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not limited to revocation of probation, parole, or supervised 1 debarment from government in another case; release 2 contracting; and suspension or revocation of a professional 3 license, none of which can serve as grounds to withdraw 4 Defendant's guilty plea; 5 No one has made any promises or offered any rewards in return в. 6 for this guilty plea, other than those contained in this 7 agreement or otherwise disclosed to the court; 8 No one has threatened defendant or defendant's family to С. 9 induce this guilty plea; and, 10 Defendant is pleading guilty because defendant is guilty and 11 D. for no other reason. 12 VII 13 AGREEMENT LIMITED TO U.S. ATTORNEY'S OFFICE, 14 SOUTHERN DISTRICT OF CALIFORNIA 15 This plea agreement is limited to the United States Attorney's 16 Office for the Southern District of California, and cannot bind any 17 other authorities in any type of matter, although the Government will 18 bring this plea agreement to the attention of other authorities if 19 20 requested by defendant. VIII 21 APPLICABILITY OF SENTENCING GUIDELINES 22 The sentence imposed will be based on the factors set forth in 23 18 U.S.C. § 3553(a). In imposing the sentence, the sentencing judge 24 must consult the United States Sentencing Guidelines (Guidelines) and 25 take them into account. Defendant has discussed the Guidelines with 26

27 defense counsel and understands that the Guidelines are only advisory, 28 not mandatory. The Court may impose a sentence more severe or less

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severe than otherwise applicable under the Guidelines, up to the maximum 1 in the statute of conviction. The sentence cannot be determined until 2 a presentence report is prepared by the U.S. Probation Office and defense 3 counsel and the Government have an opportunity to review and challenge 4 the presentence report. Defendant agrees to request that a presentence 5 6 report be prepared. Nothing in this plea agreement limits the Government's duty to provide complete and accurate facts to the district 7 court and the U.S. Probation Office. 8

IX

SENTENCE IS WITHIN SOLE DISCRETION OF JUDGE

11 This plea agreement is made pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B). The sentence is within the sole discretion of 12 the sentencing judge who may impose the maximum sentence provided by 13 statute. It is uncertain at this time what defendant's sentence will 14 The Government has not made and will not make any representation be. 15 as to what sentence defendant will receive. Any estimate of the probable 16 sentence by defense counsel is not a promise and is not binding on the 17 Court. Any recommendation made by the Government at sentencing is also 18 19 not binding on the Court. If the sentencing judge does not follow any of the parties' sentencing recommendations, defendant will not withdraw 20 the plea. 21

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PARTIES' SENTENCING RECOMMENDATIONS

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A. <u>SENTENCING GUIDELINE CALCULATIONS</u>

Although the Guidelines are only advisory and just one factor the Court will consider under 18 U.S.C. § 3553(a) in imposing a sentence, the parties will jointly recommend the following Base Offense Level, Specific Offense Characteristics, Adjustments, and Departures:

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Count One

1	Count one	
2	1.Base Offense Level [2D1.1(a) & (c)(10)]	20
3	2.Use of Interactive Computer Service [2D1.1(b)(7)]	+2
4	3.Dist. of Steroids & Masking Agents [2D1.1(b)(8)]	+2
5	4. Dist. to Professional Athlete [2D.1.1(b)(9)]	+2
6	5. Maintain Premises to Manufacture [2D1.1(b)(12)]	+2
7	6.Leader / Organizer of Organization [3B1.1(a)]	+4
8	7. Acceptance of Responsibility [3E1.1]	-3
9	8.Waiver of Appeal / Collateral Attack [5K2.0]	-3
10	Count Two	
11	1. Base Offense Level [2S1.1(a)(2)]	8
12	2. Loss Amount [2B1.1]	+14
13	3. Knowledge of Drug Proceeds [2S1.1(b)(1)]	+6
14	4. Conviction Under 18 U.S.C. § 1956 [2S1.1.(b)(2)]	+2
15	5. Leader / Organizer of Organization [3B1.1(a)]	+4
16	6. Acceptance of Responsibility [3E1.1]	-3
17	7.Waiver of Appeal / Collateral Attack [5K2.0]	-3
18	The parties further agree that pursuant to Chapter 3, Par	t D of
19	the U.S. Sentencing Guidelines, the counts of conviction "group,	" with
20	the effect of adding two levels to the adjusted guidelines calcul	ation.
21	The adjusted guidelines score for Count 1 is 26. The adjusted guid	lelines
22	score for Count 2 is 28. Accordingly, the parties agree the	at the
23	applicable adjusted guidelines score is 30.	
24	B. <u>ACCEPTANCE OF RESPONSIBILITY</u>	

Despite paragraph A above, the Government need not recommend an adjustment for Acceptance of Responsibility if defendant engages in conduct inconsistent with acceptance of responsibility including, but not limited to, the following:

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1. Fails to truthfully admit a complete factual basis as 1 2 stated in the plea at the time the plea is entered, or falsely denies, or makes a statement inconsistent with, 3 the factual basis set forth in this agreement; 4 2. 5 Falsely denies prior criminal conduct or convictions; 6 3. Is untruthful with the Government, the Court or probation 7 officer; or Breaches this plea agreement in any way. 8 4. С. 9 FURTHER ADJUSTMENTS AND SENTENCE REDUCTIONS 10 INCLUDING THOSE UNDER 18 U.S.C. § 3553 Defendant may request or recommend additional downward adjustments, 11 departures, or variances from the Sentencing Guidelines under 18 U.S.C. 12 \$ 3553, provided, however, that Defendant may only seek a sentence 13 consistent with the terms of Section X.F of this plea agreement. The 14Government will oppose any downward adjustments, departures, 15 or variances not set forth in Section X, paragraph A above. 16 D. NO AGREEMENT AS TO CRIMINAL HISTORY CATEGORY 17 The parties have **no** agreement as to defendant's Criminal History 18 19 Category, except that, if defendant is determined to be a Career 20 Offender, the parties agree that defendant is automatically a Criminal History Category VI pursuant to USSG § 4B1.1(b). 21 "FACTUAL BASIS" AND "RELEVANT CONDUCT" INFORMATION Ε. 22 The facts in the "factual basis" paragraph of this agreement are 23 true and may be considered as "relevant conduct" under USSG § 1B1.3 and 24 as the nature and circumstances of the offense under 18 U.S.C. 25 § 3553(a)(1). 26 27 28 13 Def. Initials

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F. PARTIES' RECOMMENDATIONS REGARDING CUSTODY

Provided that Defendant is in Criminal History Category I, the parties will make a joint recommendation of 96 months in custody. They will not recommend a fine, but will recommend the applicable mandatory special assessments. If Defendant is in Criminal History Category II or above, the Government may recommend as much as the low end of the applicable guidelines range, and Defendant may seek any sentence.

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G. SPECIAL ASSESSMENT AND FINE

9 The parties will jointly recommend that defendant pay a special 10 assessment in the amount of \$100.00 per felony count of conviction to 11 be paid forthwith at time of sentencing. The special assessment shall 12 be paid through the office of the Clerk of the District Court by bank 13 or cashier's check or money order made payable to the "Clerk, 14 United States District Court."

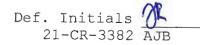
The parties will not recommend imposition of a fine due to defendant's limited financial prospects and because the cost of collection, even taking into account the Inmate Responsibility Program, likely would exceed the amounts that could reasonably be expected to be collected.

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H. SUPERVISED RELEASE

The Government is free to recommend a period of supervised release. If the Court imposes a term of supervised release, Defendant will not seek to reduce or terminate early the term of supervised release until defendant has served at least two-thirds of the term of supervised release and has fully paid and satisfied any special assessments, fine, criminal forfeiture judgment and restitution judgment.

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DEFENDANT WAIVES APPEAL AND COLLATERAL ATTACK

Defendant waives (gives up) all rights to appeal and to collaterally attack every aspect of the conviction and sentence. The only exception is that defendant may collaterally attack the conviction or sentence on the basis that defendant received ineffective assistance of counsel.

XII

BREACH OF THE PLEA AGREEMENT

9 Defendant and defendant's attorney know the terms of this agreement 10 and shall raise, before the sentencing hearing is complete, any claim 11 that the Government has not complied with this agreement. Otherwise, 12 such claims shall be deemed waived (that is, deliberately not raised 13 despite awareness that the claim could be raised), cannot later be made 14 to any court, and if later made to a court, shall constitute a breach 15 of this agreement.

Defendant breaches this agreement if defendant violates or fails to perform any obligation under this agreement. The following are nonexhaustive examples of acts constituting a breach:

- 19 A. Failing to plead guilty pursuant to this agreement;
- B. Failing to fully accept responsibility as established in
 Section X, paragraph B, above;
- 22 C. Failing to appear in court;

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- 23 D. Attempting to withdraw the plea;
- 24 E. Failing to abide by any court order related to this case;
- F. Appealing (which occurs if a notice of appeal is filed) or
 collaterally attacking the conviction or sentence in violation
 of Section XI of this plea agreement; or

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Engaging in additional criminal conduct from the time of arrest until the time of sentencing.

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G.

If defendant breaches this plea agreement, defendant will not be 3 able to enforce any provisions, and the Government will be relieved of 4 all its obligations under this plea agreement. For example, the 5 Government may proceed to sentencing but recommend a different sentence 6 7 than what it agreed to recommend above. Or the Government may pursue any charges including those that were dismissed, promised to be 8 dismissed, or not filed as a result of this agreement (defendant agrees 9 that any statute of limitations relating to such charges is tolled 10 indefinitely as of the date all parties have signed this agreement; 11 defendant also waives any double jeopardy defense to such charges). In 12 addition, the Government may move to set aside defendant's guilty plea. 13 Defendant may not withdraw the guilty plea based on the Government's 14 pursuit of remedies for defendant's breach. 15

Additionally, if defendant breaches this plea agreement: (i) any 16 statements made by defendant, under oath, at the guilty plea hearing 17 (before either a Magistrate Judge or a District Judge); (ii) the factual 18 basis statement in Section II.B in this agreement; and (iii) any evidence 19 derived from such statements, are admissible against defendant in any 20 prosecution of, or any action against, defendant. This includes the 21 prosecution of the charge(s) that is the subject of this plea agreement 22 or any charge(s) that the prosecution agreed to dismiss or not file as 23 part of this agreement, but later pursues because of a breach by the 24 25 Defendant. Additionally, defendant knowingly, voluntarily, and 26 intelligently waives any argument that the statements and any evidence derived from the statements should be suppressed, cannot be used by the 27 Government, or are inadmissible under the United States Constitution, 28

1 any statute, Rule 410 of the Federal Rules of Evidence, Rule 11(f) of 2 the Federal Rules of Criminal Procedure, and any other federal rule.

XIII

CONTENTS AND MODIFICATION OF AGREEMENT

5 This plea agreement embodies the entire agreement between the 6 parties and supersedes any other agreement, written or oral. No 7 modification of this plea agreement shall be effective unless in writing 8 signed by all parties.

XIV

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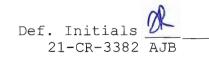
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DEFENDANT AND COUNSEL FULLY UNDERSTAND AGREEMENT

By signing this agreement, defendant certifies that defendant has read it (or that it has been read to defendant in defendant's native language). Defendant has discussed the terms of this agreement with defense counsel and fully understands its meaning and effect.

- 15 // 16 //
- 17 //
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1	xv
2	DEFENDANT SATISFIED WITH COUNSEL
3	Defendant has consulted with counsel and is satisfied with
4	counsel's representation. This is defendant's independent opinion, and
5	defendant's counsel did not advise defendant about what to say in this
6	regard.
7	Respectfully Submitted,
8	RANDY S. GROSSMAN
9	United States Attorney
10	01/19/2023 Owen Roth
11	Assistant U.S. Attorney
12	January 18, 2023
13	DATED KNUT S JOHNSON Defense Counsel
14	
15	IN ADDITION TO THE FOREGOING PROVISIONS TO WHICH I AGREE, I SWEAR UNDER PENALTY OF PERJURY THAT THE FACTS IN THE "FACTUAL BASIS" PARAGRAPH ABOVE
16	ARE TRUE.
17	1/18/23 Norme piera
18 19	DATED JÄMES CHARLES RIVERA Defendant
20	Rev. 6/8/2021 cek/bq
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	18 Def. Initials 21-CR-3382 AJB