

1 TRACY L. WILKISON  
Acting United States Attorney  
2 BRANDON D. FOX  
Assistant United States Attorney  
3 Chief, Criminal Division  
FARAZ R. MOHAMMADI (Cal. Bar No. 294497)  
4 Assistant United States Attorney  
8000 United States Courthouse  
5 411 West Fourth Street  
Santa Ana, California 92701  
6 Telephone: (714) 338-3599  
Facsimile: (714) 338-3708  
7 E-mail: faraz.mohammadi@usdoj.gov

8 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
9

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 EFRAIN MEDERO,

16 Defendant.

No. SA CR 20-111-CJC

PLEA AGREEMENT FOR DEFENDANT  
EFRAIN MEDERO

17  
18 1. This constitutes the plea agreement between EFRAIN MEDERO  
19 ("defendant") and the United States Attorney's Office for the Central  
20 District of California (the "USAO") in the above-captioned case.  
21 This agreement is limited to the USAO and cannot bind any other  
22 federal, state, local, or foreign prosecuting, enforcement,  
23 administrative, or regulatory authorities.

24 DEFENDANT'S OBLIGATIONS

25 2. Defendant agrees to:

26 a. At the earliest opportunity requested by the USAO and  
27 provided by the Court, appear and plead guilty to count one of the  
28 indictment, which charges defendant with possession with intent to

1 distribute methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1),  
2 (b)(1)(A)(viii).

3 b. Not contest facts agreed to in this agreement.

4 c. Abide by all agreements regarding sentencing contained  
5 in this agreement.

6 d. Appear for all court appearances, surrender as ordered  
7 for service of sentence, obey all conditions of any bond, and obey  
8 any other ongoing court order in this matter.

9 e. Not commit any crime; however, offenses that would be  
10 excluded for sentencing purposes under United States Sentencing  
11 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not  
12 within the scope of this agreement.

13 f. Be truthful at all times with the United States  
14 Probation and Pretrial Services Office and the Court.

15 g. Pay the applicable special assessment at or before the  
16 time of sentencing unless defendant has demonstrated a lack of  
17 ability to pay such assessments.

18 h. Defendant further agrees:

19 1. To forfeit all right, title, and interest in and  
20 to any and all monies, properties, and/or assets of any kind, derived  
21 from or acquired as a result of, or used to facilitate the commission  
22 of, or involved in the illegal activity to which defendant is  
23 pleading guilty, including but not limited to the following:

24 A. One Sig Sauer, model P245, .45 caliber semi-  
25 automatic pistol, bearing serial number C013958 (the "Forfeitable  
26 Property").  
27  
28

1                   2. To the Court's entry of an order of forfeiture at  
2 or before sentencing with respect to the Forfeitable Property and to  
3 the forfeiture of the assets.

4                   3. To take whatever steps are necessary to pass to  
5 the United States clear title to the Forfeitable Property, including,  
6 without limitation, the execution of a consent decree of forfeiture  
7 and the completing of any other legal documents required for the  
8 transfer of title to the United States.

9                   4. Not to contest any administrative forfeiture  
10 proceedings or civil judicial proceedings commenced against the  
11 Forfeitable Property. If defendant submitted a claim and/or petition  
12 for remission for all or part of the Forfeitable Property on behalf  
13 of himself or any other individual or entity, defendant shall and  
14 hereby does withdraw any such claims or petitions, and further agrees  
15 to waive any right he may have to seek remission or mitigation of the  
16 forfeiture of the Forfeitable Property.

17                   5. Not to assist any other individual in any effort  
18 falsely to contest the forfeiture of the Forfeitable Property.

19                   6. Not to claim that reasonable cause to seize the  
20 Forfeitable Property was lacking.

21                   7. To prevent the transfer, sale, destruction, or  
22 loss of the Forfeitable Property to the extent defendant has the  
23 ability to do so.

24                   8. To fill out and deliver to the USAO a completed  
25 financial statement listing defendant's assets on a form provided by  
26 the USAO.

1           9. That forfeiture of Forfeitable Property shall not  
2 be counted toward satisfaction of any special assessment, fine,  
3 restitution, costs, or other penalty the Court may impose.

4           10. With respect to any criminal forfeiture ordered  
5 as a result of this plea agreement, defendant waives: (1) the  
6 requirements of Federal Rules of Criminal Procedure 32.2 and 43(a)  
7 regarding notice of the forfeiture in the charging instrument,  
8 announcements of the forfeiture sentencing, and incorporation of the  
9 forfeiture in the judgment; (2) all constitutional and statutory  
10 challenges to the forfeiture (including by direct appeal, habeas  
11 corpus or any other means); and (3) all constitutional, legal, and  
12 equitable defenses to the forfeiture of the Forfeitable Property in  
13 any proceeding on any grounds including, without limitation, that the  
14 forfeiture constitutes an excessive fine or punishment. Defendant  
15 acknowledges that the forfeiture of the Forfeitable Property is part  
16 of the sentence that may be imposed in this case and waives any  
17 failure by the Court to advise defendant of this, pursuant to Federal  
18 Rule of Criminal Procedure 11(b)(1)(J), at the time the Court accepts  
19 defendant's guilty plea.

20                           THE USAO'S OBLIGATIONS

21           3. The USAO agrees to:

22               a. Not contest facts agreed to in this agreement.

23               b. Abide by all agreements regarding sentencing contained  
24 in this agreement.

25               c. At the time of sentencing, move to dismiss the  
26 remaining counts of the indictment as against defendant. Defendant  
27 agrees, however, that at the time of sentencing the Court may  
28 consider any dismissed charges in determining the applicable

1 Sentencing Guidelines range, the propriety and extent of any  
2 departure from that range, and the sentence to be imposed.

3 d. At the time of sentencing, provided that defendant  
4 demonstrates an acceptance of responsibility for the offenses up to and  
5 including the time of sentencing, recommend a two-level reduction in the  
6 applicable Sentencing Guidelines offense level, pursuant to U.S.S.G. §  
7 3E1.1, and recommend and, if necessary, move for an additional one-level  
8 reduction if available under that section.

9 e. Recommend that defendant be sentenced to a term of  
10 imprisonment no higher than the low end of the applicable Sentencing  
11 Guidelines range, provided that the offense level used by the Court  
12 to determine that range is 33 or higher. For purposes of this  
13 agreement, the low end of the Sentencing Guidelines range is that  
14 defined by the Sentencing Table in U.S.S.G. Chapter 5, Part A.

15 NATURE OF THE OFFENSE

16 4. Defendant understands that for defendant to be guilty of  
17 the crime charged in count one, that is, possession with intent to  
18 distribute methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1),  
19 (b)(1)(A)(viii), the following must be true: (1) defendant knowingly  
20 possessed methamphetamine; (2) defendant intended to distribute the  
21 methamphetamine to another person; and (3) defendant knew that it was  
22 methamphetamine or some other prohibited drug.

23 5. Defendant understands that defendant may be guilty of the  
24 crime charged in count one even if defendant did not personally  
25 commit the act or acts constituting the crime but aided and abetted  
26 in its commission. For defendant to be guilty of aiding and abetting  
27 a violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), the following  
28 must be true: (1) the crime of possession with intent to distribute

1 methamphetamine was committed by someone; (2) defendant knowingly and  
2 intentionally aided, counseled, commanded, induced, or procured that  
3 person to commit at least one element of the crime as charged; and  
4 (3) defendant acted before the crime was completed.

5 6. Defendant understands that for defendant to be subject to  
6 the statutory maximum and statutory minimum sentences set forth  
7 below, the government must prove beyond a reasonable doubt that  
8 defendant possessed at least 50 grams of actual methamphetamine.  
9 Defendant admits that defendant, in fact, possessed at least 50 grams  
10 of actual methamphetamine.

11 PENALTIES

12 7. Defendant understands that the statutory maximum sentence  
13 that the Court can impose for a violation of 21 U.S.C. §§ 841(a)(1),  
14 (b)(1)(A)(viii), is: life imprisonment; a life-time period of  
15 supervised release; a fine of \$10,000,000 or twice the gross gain or  
16 gross loss resulting from the offense, whichever is greatest; and a  
17 mandatory special assessment of \$100.

18 8. Defendant understands that the statutory mandatory minimum  
19 sentence that the Court must impose for a violation of 21 U.S.C.  
20 §§ 841(a)(1), (b)(1)(A)(viii), is: 10 years' imprisonment, followed  
21 by a five-year period of supervised release, and a mandatory special  
22 assessment of \$100.

23 9. Defendant understands that supervised release is a period  
24 of time following imprisonment during which defendant will be subject  
25 to various restrictions and requirements. Defendant understands that  
26 if defendant violates one or more of the conditions of any supervised  
27 release imposed, defendant may be returned to prison for all or part  
28

1 of the term of supervised release authorized by statute for the  
2 offense that resulted in the term of supervised release.

3 10. Defendant understands that under 21 U.S.C. § 862a,  
4 defendant will not be eligible for assistance under state programs  
5 funded under the Social Security Act or Federal Food Stamp Act or for  
6 federal food stamp program benefits, and that any such benefits or  
7 assistance received by defendant's family members will be reduced to  
8 reflect defendant's ineligibility.

9 11. Defendant understands that, by pleading guilty, defendant  
10 may be giving up valuable government benefits and valuable civic  
11 rights, such as the right to vote, the right to possess a firearm,  
12 the right to hold office, and the right to serve on a jury.  
13 Defendant understands that he is pleading guilty to a felony and that  
14 it is a federal crime for a convicted felon to possess a firearm or  
15 ammunition. Defendant understands that the conviction in this case  
16 may also subject defendant to various other collateral consequences,  
17 including but not limited to revocation of probation, parole, or  
18 supervised release in another case and suspension or revocation of a  
19 professional license. Defendant understands that unanticipated  
20 collateral consequences will not serve as grounds to withdraw  
21 defendant's guilty plea.

22 12. Defendant and his counsel have discussed the fact that, and  
23 defendant understands that, if defendant is not a United States  
24 citizen, the conviction in this case makes it practically inevitable  
25 and a virtual certainty that defendant will be removed or deported  
26 from the United States. Defendant may also be denied United States  
27 citizenship and admission to the United States in the future.  
28 Defendant understands that while there may be arguments that

1 defendant can raise in immigration proceedings to avoid or delay  
2 removal, removal is presumptively mandatory and a virtual certainty  
3 in this case. Defendant further understands that removal and  
4 immigration consequences are the subject of a separate proceeding and  
5 that no one, including his attorney or the Court, can predict to an  
6 absolute certainty the effect of his conviction on his immigration  
7 status. Defendant nevertheless affirms that he wants to plead guilty  
8 regardless of any immigration consequences that his plea may entail,  
9 even if the consequence is automatic removal from the United States.

10 FACTUAL BASIS

11 13. Defendant admits that defendant is, in fact, guilty of the  
12 offense to which defendant is agreeing to plead guilty. Defendant  
13 and the USAO agree to the statement of facts provided below and agree  
14 that this statement of facts is sufficient to support a plea of  
15 guilty to the charge described in this agreement and to establish the  
16 Sentencing Guidelines factors set forth in paragraph 15 below but is  
17 not meant to be a complete recitation of all facts relevant to the  
18 underlying criminal conduct or all facts known to either party that  
19 relate to that conduct.

20 On or about February 6, 2020, in Orange County, within the  
21 Central District of California, defendant knowingly aided and abetted  
22 the possession, with the intent to distribute to another person, of  
23 848 grams of actual methamphetamine and 98 grams of cocaine.  
24 Defendant also knowingly possessed a firearm, namely, a Sig Sauer,  
25 model P245, .45 caliber semi-automatic pistol, bearing serial number  
26 C013958, in furtherance of the above-mentioned drug-trafficking  
27 crimes.



SENTENCING FACTORS

14. Defendant understands that in determining defendant's sentence the Court is required to calculate the applicable Sentencing Guidelines range and to consider that range, possible departures under the Sentencing Guidelines, and the other sentencing factors set forth in 18 U.S.C. § 3553(a). Defendant understands that the Sentencing Guidelines are advisory only, that defendant cannot have any expectation of receiving a sentence within the calculated Sentencing Guidelines range, and that after considering the Sentencing Guidelines and the other § 3553(a) factors, the Court will be free to exercise its discretion to impose any sentence it finds appropriate between the mandatory minimum and the maximum set by statute for the crime of conviction.

15. Defendant and the USAO agree to the following applicable Sentencing Guidelines factors:

Base Offense Level:	34	[U.S.S.G. § 2D1.1(c)(3)]
---------------------	----	--------------------------

Firearm Possessed:	+2	[U.S.S.G. § 2D1.1(b)(1)]
--------------------	----	--------------------------

Defendant and the USAO reserve the right to argue that additional specific offense characteristics, adjustments, and departures under the Sentencing Guidelines are appropriate. Defendant understands that defendant's offense level could be increased if defendant is a career offender under U.S.S.G. §§ 4B1.1 and 4B1.2. If defendant's offense level is so altered, defendant and the USAO will not be bound by the agreement to Sentencing Guideline factors set forth above. Defendant and the USAO further understand that defendant's base offense level could be reduced pursuant to U.S.S.G. § 2D1.1(a)(5) if defendant receives an adjustment for a mitigating role under U.S.S.G. § 3B1.2.

1           16. Defendant understands that there is no agreement as to  
2 defendant's criminal history or criminal history category.

3           17. Defendant and the USAO reserve the right to argue for a  
4 sentence outside the sentencing range established by the Sentencing  
5 Guidelines based on the factors set forth in 18 U.S.C. § 3553(a)(1),  
6 (a)(2), (a)(3), (a)(6), and (a)(7).

7                               WAIVER OF CONSTITUTIONAL RIGHTS

8           18. Defendant understands that by pleading guilty, defendant  
9 gives up the following rights:

10               a. The right to persist in a plea of not guilty.

11               b. The right to a speedy and public trial by jury.

12               c. The right to be represented by counsel -- and if  
13 necessary have the Court appoint counsel -- at trial. Defendant  
14 understands, however, that, defendant retains the right to be  
15 represented by counsel -- and if necessary have the Court appoint  
16 counsel -- at every other stage of the proceeding.

17               d. The right to be presumed innocent and to have the  
18 burden of proof placed on the government to prove defendant guilty  
19 beyond a reasonable doubt.

20               e. The right to confront and cross-examine witnesses  
21 against defendant.

22               f. The right to testify and to present evidence in  
23 opposition to the charges, including the right to compel the  
24 attendance of witnesses to testify.

25               g. The right not to be compelled to testify, and, if  
26 defendant chose not to testify or present evidence, to have that  
27 choice not be used against defendant.

1           h. Any and all rights to pursue any affirmative defenses,  
2 Fourth Amendment or Fifth Amendment claims, and other pretrial  
3 motions that have been filed or could be filed.

4                           WAIVER OF APPEAL OF CONVICTION

5           19. Defendant understands that, with the exception of an appeal  
6 based on a claim that defendant's guilty plea was involuntary, by  
7 pleading guilty defendant is waiving and giving up any right to  
8 appeal defendant's conviction on the offense to which defendant is  
9 pleading guilty. Defendant understands that this waiver includes,  
10 but is not limited to, arguments that the statute to which defendant  
11 is pleading guilty is unconstitutional, and any and all claims that  
12 the statement of facts provided herein is insufficient to support  
13 defendant's plea of guilty.

14                           LIMITED MUTUAL WAIVER OF APPEAL OF SENTENCE

15           20. Defendant agrees that, provided the Court imposes a total  
16 term of imprisonment on all counts of conviction of no greater than  
17 the high end of the range corresponding to an offense level of 33 and  
18 the criminal history category calculated by the Court, defendant  
19 gives up the right to appeal all of the following: (a) the procedures  
20 and calculations used to determine and impose any portion of the  
21 sentence, with the exception of the Court's calculation of  
22 defendant's criminal history category; (b) the term of imprisonment  
23 imposed by the Court, except to the extent it depends on the Court's  
24 calculation of defendant's criminal history category; (c) the fine  
25 imposed by the Court, provided it is within the statutory maximum;  
26 (d) to the extent permitted by law, the constitutionality or legality  
27 of defendant's sentence, provided it is within the statutory maximum;  
28 (e) the term of probation or supervised release imposed by the Court,

1 provided it is within the statutory maximum; and (f) any of the  
2 following conditions of probation or supervised release imposed by  
3 the Court: the conditions set forth in General Order 20-04 of this  
4 Court; the drug testing conditions mandated by 18 U.S.C.  
5 §§ 3563(a)(5) and 3583(d); and the alcohol and drug use conditions  
6 authorized by 18 U.S.C. § 3563(b)(7).

7 21. The USAO agrees that, provided all portions of the sentence  
8 are at or above the statutory minimum and at or below the statutory  
9 maximum specified above, the USAO gives up its right to appeal any  
10 portion of the sentence.

11 RESULT OF WITHDRAWAL OF GUILTY PLEA

12 22. Defendant agrees that if, after entering a guilty plea  
13 pursuant to this agreement, defendant seeks to withdraw and succeeds  
14 in withdrawing defendant's guilty plea on any basis other than a  
15 claim and finding that entry into this plea agreement was  
16 involuntary, then (a) the USAO will be relieved of all of its  
17 obligations under this agreement; and (b) should the USAO choose to  
18 pursue any charge that was either dismissed or not filed as a result  
19 of this agreement, then (i) any applicable statute of limitations  
20 will be tolled between the date of defendant's signing of this  
21 agreement and the filing commencing any such action; and  
22 (ii) defendant waives and gives up all defenses based on the statute  
23 of limitations, any claim of pre-indictment delay, or any speedy  
24 trial claim with respect to any such action, except to the extent  
25 that such defenses existed as of the date of defendant's signing this  
26 agreement.

27 //

28 //

1                   RESULT OF VACATUR, REVERSAL OR SET-ASIDE

2           23. Defendant agrees that if the count of conviction is  
3 vacated, reversed, or set aside, both the USAO and defendant will be  
4 released from all their obligations under this agreement.

5                   EFFECTIVE DATE OF AGREEMENT

6           24. This agreement is effective upon signature and execution of  
7 all required certifications by defendant, defendant's counsel, and an  
8 Assistant United States Attorney.

9                   BREACH OF AGREEMENT

10          25. Defendant agrees that if defendant, at any time after the  
11 signature of this agreement and execution of all required  
12 certifications by defendant, defendant's counsel, and an Assistant  
13 United States Attorney, knowingly violates or fails to perform any of  
14 defendant's obligations under this agreement ("a breach"), the USAO  
15 may declare this agreement breached. All of defendant's obligations  
16 are material, a single breach of this agreement is sufficient for the  
17 USAO to declare a breach, and defendant shall not be deemed to have  
18 cured a breach without the express agreement of the USAO in writing.  
19 If the USAO declares this agreement breached, and the Court finds  
20 such a breach to have occurred, then: (a) if defendant has previously  
21 entered a guilty plea pursuant to this agreement, defendant will not  
22 be able to withdraw the guilty plea, and (b) the USAO will be  
23 relieved of all its obligations under this agreement.

24          26. Following the Court's finding of a knowing breach of this  
25 agreement by defendant, should the USAO choose to pursue any charge  
26 that was either dismissed or not filed as a result of this agreement,  
27 then:  
28

1           a. Defendant agrees that any applicable statute of  
2 limitations is tolled between the date of defendant's signing of this  
3 agreement and the filing commencing any such action.

4           b. Defendant waives and gives up all defenses based on  
5 the statute of limitations, any claim of pre-indictment delay, or any  
6 speedy trial claim with respect to any such action, except to the  
7 extent that such defenses existed as of the date of defendant's  
8 signing this agreement.

9           c. Defendant agrees that: (i) any statements made by  
10 defendant, under oath, at the guilty plea hearing (if such a hearing  
11 occurred prior to the breach); (ii) the agreed to factual basis  
12 statement in this agreement; and (iii) any evidence derived from such  
13 statements, shall be admissible against defendant in any such action  
14 against defendant, and defendant waives and gives up any claim under  
15 the United States Constitution, any statute, Rule 410 of the Federal  
16 Rules of Evidence, Rule 11(f) of the Federal Rules of Criminal  
17 Procedure, or any other federal rule, that the statements or any  
18 evidence derived from the statements should be suppressed or are  
19 inadmissible.

20           COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

21                   OFFICE NOT PARTIES

22           27. Defendant understands that the Court and the United States  
23 Probation and Pretrial Services Office are not parties to this  
24 agreement and need not accept any of the USAO's sentencing  
25 recommendations or the parties' agreements to facts or sentencing  
26 factors.

27           28. Defendant understands that both defendant and the USAO are  
28 free to: (a) supplement the facts by supplying relevant information

1 to the United States Probation and Pretrial Services Office and the  
2 Court, (b) correct any and all factual misstatements relating to the  
3 Court's Sentencing Guidelines calculations and determination of  
4 sentence, and (c) argue on appeal and collateral review that the  
5 Court's Sentencing Guidelines calculations and the sentence it  
6 chooses to impose are not error, although each party agrees to  
7 maintain its view that the calculations in paragraph 15 are  
8 consistent with the facts of this case. While this paragraph permits  
9 both the USAO and defendant to submit full and complete factual  
10 information to the United States Probation and Pretrial Services  
11 Office and the Court, even if that factual information may be viewed  
12 as inconsistent with the facts agreed to in this agreement, this  
13 paragraph does not affect defendant's and the USAO's obligations not  
14 to contest the facts agreed to in this agreement.

15 29. Defendant understands that even if the Court ignores any  
16 sentencing recommendation, finds facts or reaches conclusions  
17 different from those agreed to, and/or imposes any sentence up to the  
18 maximum established by statute, defendant cannot, for that reason,  
19 withdraw defendant's guilty plea, and defendant will remain bound to  
20 fulfill all defendant's obligations under this agreement. Defendant  
21 understands that no one -- not the prosecutor, defendant's attorney,  
22 or the Court -- can make a binding prediction or promise regarding  
23 the sentence defendant will receive, except that it will be between  
24 the statutory mandatory minimum and the statutory maximum.

25 NO ADDITIONAL AGREEMENTS

26 30. Defendant understands that, except as set forth herein,  
27 there are no promises, understandings, or agreements between the USAO  
28 and defendant or defendant's attorney, and that no additional

1 promise, understanding, or agreement may be entered into unless in a  
2 writing signed by all parties or on the record in court.

3 PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

4 31. The parties agree that this agreement will be considered  
5 part of the record of defendant's guilty plea hearing as if the  
6 entire agreement had been read into the record of the proceeding.

7 AGREED AND ACCEPTED

8 UNITED STATES ATTORNEY'S OFFICE  
9 FOR THE CENTRAL DISTRICT OF  
CALIFORNIA

10 TRACY L. WILKISON  
Acting United States Attorney

11   
12 FARAZ R. MOHAMMADI  
13 Assistant United States Attorney

04/15/2021

Date

14   
15 EFRAIN MEDERO  
Defendant

4/12/21  
Date

16   
17 MICHAEL A. SCHACHTER  
Attorney for Defendant EFRAIN  
18 MEDERO


4/12/21  
Date

19 CERTIFICATION OF DEFENDANT

20 I have read this agreement in its entirety. I have had enough  
21 time to review and consider this agreement, and I have carefully and  
22 thoroughly discussed every part of it with my attorney. I understand  
23 the terms of this agreement, and I voluntarily agree to those terms.  
24 I have discussed the evidence with my attorney, and my attorney has  
25 advised me of my rights, of possible pretrial motions that might be  
26 filed, of possible defenses that might be asserted either prior to or  
27 at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a),  
28 of relevant Sentencing Guidelines provisions, and of the consequences



1 of entering into this agreement. No promises, inducements, or  
2 representations of any kind have been made to me other than those  
3 contained in this agreement. No one has threatened or forced me in  
4 any way to enter into this agreement. I am satisfied with the  
5 representation of my attorney in this matter, and I am pleading  
6 guilty because I am guilty of the charge and wish to take advantage  
7 of the promises set forth in this agreement, and not for any other  
8 reason.

9   
10 EFRAIN MEDERO  
11 Defendant

4/12/21  
10 Date

12 CERTIFICATION OF DEFENDANT'S ATTORNEY


13 I am EFRAIN MEDERO's attorney. I have carefully and thoroughly  
14 discussed every part of this agreement with my client. Further, I  
15 have fully advised my client of his rights, of possible pretrial  
16 motions that might be filed, of possible defenses that might be  
17 asserted either prior to or at trial, of the sentencing factors set  
18 forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines  
19 provisions, and of the consequences of entering into this agreement.  
20 To my knowledge: no promises, inducements, or representations of any  
21 kind have been made to my client other than those contained in this  
22 agreement; no one has threatened or forced my client in any way to  
23 enter into this agreement; my client's decision to enter into this  
24 agreement is an informed and voluntary one; and the factual basis set

25 //

26 //

27 //

1 forth in this agreement is sufficient to support my client's entry of  
2 a guilty plea pursuant to this agreement.

3   
4 MICHAEL A. SCHACHTER  
5 Attorney for Defendant EFRAIN  
6 MEDERO

4/12/21  
Date