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10 Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 LU ZHANG,
aka "Nikki," et al.,

18 Defendants.
19

No. 2:23-CR-00596-RGK-1

PLEA AGREEMENT FOR DEFENDANT
LU ZHANG

20 1. This constitutes the plea agreement between LU ZHANG
21 ("defendant") and the United States Attorney's Office for the Central
22 District of California (the "USAO") and the United States Department
23 of Justice, Computer Crime and Intellectual Property Section ("CCIPS"
24 and together with the USAO, the "United States") in the above-
25 captioned case. This agreement is limited to the USAO and CCIPS and
26 cannot bind any other federal, state, local, or foreign prosecuting,
27 enforcement, administrative, or regulatory authorities.
28

DEFENDANT'S OBLIGATIONS

2. Defendant agrees to:

a. At the earliest opportunity requested by the United States and provided by the Court, appear and plead guilty to count one of the indictment in United States v. Lu Zhang, et al., CR No. 23-596-RGK, which charges defendant with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h).

b. Not contest facts agreed to in this agreement.

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

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

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

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

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

h. Defendant agrees that any and all criminal debt ordered by the Court will be due in full and immediately. The government is not precluded from pursuing, in excess of any payment schedule set by the Court, any and all available remedies by which to satisfy defendant's payment of the full financial obligation, including referral to the Treasury Offset Program.

1 i. Complete the Financial Disclosure Statement on a form
2 provided by the USAO and, within 30 days of defendant's entry of a
3 guilty plea, deliver the signed and dated statement, along with all
4 of the documents requested therein, to the USAO by either email at
5 usacac.FinLit@usdoj.gov (preferred) or mail to the USAO Financial
6 Litigation Section at 300 North Los Angeles Street, Suite 7516, Los
7 Angeles, CA 90012. Defendant agrees that defendant's ability to pay
8 criminal debt shall be assessed based on the completed Financial
9 Disclosure Statement and all required supporting documents, as well
10 as other relevant information relating to ability to pay.

11 j. Authorize the USAO to obtain a credit report upon
12 returning a signed copy of this plea agreement.

13 k. Consent to the USAO inspecting and copying all of
14 defendant's financial documents and financial information held by the
15 United States Probation and Pretrial Services Office.

16 THE UNITED STATES' OBLIGATIONS

17 3. The United States agrees to:

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

19 b. Abide by all agreements regarding sentencing contained
20 in this agreement.

21 c. At the time of sentencing, move to dismiss the
22 remaining counts of the indictment as against defendant. Defendant
23 agrees, however, that at the time of sentencing the Court may
24 consider any dismissed charges in determining the applicable
25 Sentencing Guidelines range, the propriety and extent of any
26 departure from that range, and the sentence to be imposed.

27 d. At the time of sentencing, provided that defendant
28 demonstrates an acceptance of responsibility for the offense up to

1 and including the time of sentencing, recommend a two-level reduction
2 in the applicable Sentencing Guidelines offense level, pursuant to
3 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an
4 additional one-level reduction if available under that section.

5 NATURE OF THE OFFENSE

6 4. Defendant understands that for defendant to be guilty of
7 the crime charged in count one, that is, conspiracy to commit money
8 laundering, in violation of Title 18, United States Code, Section
9 1956(h), the following must be true: First, there was an agreement
10 between two or more persons to engage in concealment money
11 laundering, in violation of Title 18, United States Code, Section
12 1956(a)(1)(B)(i); and second, defendant became a member of the
13 conspiracy knowing of its object and intending to help accomplish it.
14 The elements of concealment money laundering, are as follows: first,
15 defendant conducted or intended to conduct a financial transaction
16 involving property that represented the proceeds of wire fraud, in
17 violation of Title 18, United States Code, Section 1343; second,
18 defendant knew that the property represented the proceeds of some
19 form of unlawful activity; and third, defendant knew that the
20 transaction was designed in whole or in part to conceal or disguise
21 the nature, location, source, ownership, and control of the proceeds.

22 PENALTIES AND RESTITUTION

23 5. Defendant understands that the statutory maximum sentence
24 that the Court can impose for a violation of Title 18, United States
25 Code, Section 1956(h), is: 20 years' imprisonment; a three-year
26 period of supervised release; a fine of \$500,000 or twice the gross
27 gain or gross loss resulting from the offense, whichever is greatest;
28 and a mandatory special assessment of \$100.

1 6. Defendant understands that defendant will be required to
2 pay full restitution to the victims of the offense to which defendant
3 is pleading guilty. Defendant agrees that, in return for the United
4 States' compliance with its obligations under this agreement, the
5 Court may order restitution to persons other than the victims of the
6 offense to which defendant is pleading guilty and in amounts greater
7 than those alleged in the count to which defendant is pleading
8 guilty. In particular, defendant agrees that the Court may order
9 restitution to any victim of any of the following for any losses
10 suffered by that victim as a result: any relevant conduct, as defined
11 in U.S.S.G. § 1B1.3, in connection with the offenses to which
12 defendant is pleading guilty. The applicable amount of restitution
13 is at least \$20,844,337. The parties agree that the amount of
14 restitution could change based on facts that come to the attention of
15 the parties prior to sentencing.

16 7. Defendant understands that supervised release is a period
17 of time following imprisonment during which defendant will be subject
18 to various restrictions and requirements. Defendant understands that
19 if defendant violates one or more of the conditions of any supervised
20 release imposed, defendant may be returned to prison for all or part
21 of the term of supervised release authorized by statute for the
22 offense that resulted in the term of supervised release, which could
23 result in defendant serving a total term of imprisonment greater than
24 the statutory maximum stated above.

25 8. Defendant understands that, by pleading guilty, defendant
26 may be giving up valuable government benefits and valuable civic
27 rights, such as the right to vote, the right to possess a firearm,
28 the right to hold office, and the right to serve on a jury. Defendant

1 understands that she is pleading guilty to a felony and that it is a
2 federal crime for a convicted felon to possess a firearm or
3 ammunition. Defendant understands that the conviction in this case
4 may also subject defendant to various other collateral consequences,
5 including but not limited to revocation of probation, parole, or
6 supervised release in another case and suspension or revocation of a
7 professional license. Defendant understands that unanticipated
8 collateral consequences will not serve as grounds to withdraw
9 defendant's guilty plea.

10 9. Defendant and his counsel have discussed the fact that, and
11 defendant understands that, if defendant is not a United States
12 citizen, the conviction in this case makes it practically inevitable
13 and a virtual certainty that defendant will be removed or deported
14 from the United States. Defendant may also be denied United States
15 citizenship and admission to the United States in the future.
16 Defendant understands that while there may be arguments that
17 defendant can raise in immigration proceedings to avoid or delay
18 removal, removal is presumptively mandatory and a virtual certainty
19 in this case. Defendant further understands that removal and
20 immigration consequences are the subject of a separate proceeding and
21 that no one, including her attorney or the Court, can predict to an
22 absolute certainty the effect of her conviction on her immigration
23 status. Defendant nevertheless affirms that she wants to plead
24 guilty regardless of any immigration consequences that her plea may
25 entail, even if the consequence is automatic removal from the United
26 States.

FACTUAL BASIS

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

Beginning from at least September 2022, and continuing through at least March 21, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant knowingly conspired with JOSEPH WONG, JUSTIN WALKER, and HAILONG ZHU, and others, to conduct financial transactions involving property that represented the proceeds of wire fraud, in violation of Title 18, United States Code, Section 1343. Defendant became a member of the conspiracy knowing of at least one of its objects and intending to help accomplish it.

Defendant admits that she conspired with WONG, WALKER, and ZHU to launder funds obtained from victims through cryptocurrency scams and related frauds, as described in count one of the indictment, and admits that the factual allegations described in count one are true and accurate. Defendant knew that the property involved in the financial transactions represented, and would represent, the proceeds of some form of unlawful activity; that the transactions were, and would be, designed in whole or in part to conceal or disguise the nature, location, source, ownership, and control of the proceeds; and

1 that defendant and codefendants laundered at least \$20 million in
2 fraudulently obtained funds.

3 In furtherance of the conspiracy, defendant managed a network of
4 money launderers within Los Angeles County, and elsewhere. Defendant
5 communicated with her co-conspirators and coordinated acts in
6 furtherance of the conspiracy through an encrypted messaging service.
7 In order to conceal or disguise the nature, location, source,
8 ownership, and control of the fraudulently obtained victim funds,
9 defendant and WONG, WALKER, and ZHU received victim funds in bank
10 accounts established on behalf of shell companies and caused the
11 further transfer of victim funds to domestic and international bank
12 accounts. Defendant and other co-conspirators also registered shell
13 companies with the California Secretary of State, including Sea
14 Dragon Trading and Sea Dragon Remodel and opened bank accounts in the
15 names of various shell companies, including Sea Dragon Trading and
16 Sea Dragon Remodel, with United States financial institutions.
17 Defendant and other co-conspirators arranged for the transfer of the
18 fraudulently obtained proceeds via interstate and international wire
19 transfers.

20 Defendant made phone calls to United States financial
21 institutions and falsely represented that she was the accountholder
22 when, in fact, another co-conspirator was the accountholder. During
23 these calls, defendant and others tried to unfreeze accounts that
24 banks had restricted due to fraud concerns. Defendant and other co-
25 conspirators traveled to financial institutions within the Central
26 District of California to access funds in the bank accounts used to
27 launder fraud proceeds.

Defendant admits that at least \$20 million in victim funds were directly deposited into bank accounts associated with defendant and her co-conspirators, and more than \$2.2 million in victim funds were directly deposited into bank accounts associated with the Sea Dragon shell entities.

SENTENCING FACTORS

11. 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 up to the maximum set by statute for the crime of conviction.

12. Defendant and the United States agree to the following applicable Sentencing Guidelines factors:

Base Offense Level:	8	U.S.S.G. § 2S1.1(a)(2)
		U.S.S.G. § 2X1.1(a)
Laundered Funds Between More Than \$1,500,000 and More Than \$25,000,000	+16 to +22	U.S.S.G. § 2B1.1(b)(1)(I)
		U.S.S.G. § 2B1.1(b)(1)(L)
Conviction Under § 1956	+2	U.S.S.G. § 2S1.1(b)(2)(B)
Sophisticated Money Laundering	+2	U.S.S.G. § 2S1.1(b)(3)

1 Defendant and the United States reserve the right to argue that
2 additional specific offense characteristics, adjustments, and
3 departures under the Sentencing Guidelines are appropriate, including
4 the application of U.S.S.G. § 3B1.1(a). Specifically, the government
5 reserves the right to argue that defendant should receive up to a 22-
6 level enhancement for laundered funds exceeding \$25,000,000, under
7 U.S.S.G. § 2B1.1(b)(1)(L), and defendant reserves the right to argue
8 that defendant should receive no more than a 16-level enhancement for
9 laundered funds exceeding \$1,500,000, under U.S.S.G.
10 § 2B1.1(b)(1)(I).

11 13. Defendant understands that there is no agreement as to
12 defendant's criminal history or criminal history category.

13 14. Defendant and the United States reserve the right to argue
14 for a sentence outside the sentencing range established by the
15 Sentencing Guidelines based on the factors set forth in 18 U.S.C.
16 § 3553(a)(1), (a)(2), (a)(3), (a)(6), and (a)(7).

17 WAIVER OF CONSTITUTIONAL RIGHTS

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

- 20 a. The right to persist in a plea of not guilty.
21 b. The right to a speedy and public trial by jury.
22 c. The right to be represented by counsel -- and if
23 necessary have the Court appoint counsel -- at trial. Defendant
24 understands, however, that, defendant retains the right to be
25 represented by counsel -- and if necessary have the Court appoint
26 counsel -- at every other stage of the proceeding.

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

4 e. The right to confront and cross-examine witnesses
5 against defendant.

6 f. The right to testify and to present evidence in
7 opposition to the charges, including the right to compel the
8 attendance of witnesses to testify.

9 g. The right not to be compelled to testify, and, if
10 defendant chose not to testify or present evidence, to have that
11 choice not be used against defendant.

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

15 WAIVER OF APPEAL OF CONVICTION

16 16. Defendant understands that, with the exception of an appeal
17 based on a claim that defendant's guilty plea was involuntary, by
18 pleading guilty defendant is waiving and giving up any right to
19 appeal defendant's conviction on the offense to which defendant is
20 pleading guilty. Defendant understands that this waiver includes,
21 but is not limited to, arguments that the statute to which defendant
22 is pleading guilty is unconstitutional, and any and all claims that
23 the statement of facts provided herein is insufficient to support
24 defendant's plea of guilty.

25 WAIVER OF APPEAL OF SENTENCE AND COLLATERAL ATTACK

26 17. Defendant agrees that, provided the Court imposes a total
27 term of imprisonment on all counts of conviction within or below the
28 range corresponding with an offense level of 34 and the criminal

1 history category calculated by the Court, defendant gives up the
2 right to appeal all of the following: (a) the procedures and
3 calculations used to determine and impose any portion of the
4 sentence; (b) the term of imprisonment imposed by the Court; (c) the
5 fine imposed by the Court, provided it is within the statutory
6 maximum; (d) to the extent permitted by law, the constitutionality or
7 legality of defendant's sentence, provided it is within the statutory
8 maximum; (e) the term of probation or supervised release imposed by
9 the Court, provided it is within the statutory maximum; and (f) any
10 of the following conditions of probation or supervised release
11 imposed by the Court: the conditions set forth in Second Amended
12 General Order 20-04 of this Court; the drug testing conditions
13 mandated by 18 U.S.C. §§ 3563(a)(5) and 3583(d); and the alcohol and
14 drug use conditions authorized by 18 U.S.C. § 3563(b)(7).

15 18. Defendant also gives up any right to bring a post-
16 conviction collateral attack on the conviction or sentence, including
17 any order of restitution, except a post-conviction collateral attack
18 based on a claim of ineffective assistance of counsel, a claim of
19 newly discovered evidence, or an explicitly retroactive change in the
20 applicable Sentencing Guidelines, sentencing statutes, or statutes of
21 conviction. Defendant understands that this waiver includes, but is
22 not limited to, arguments that the statute to which defendant is
23 pleading guilty is unconstitutional, and any and all claims that the
24 statement of facts provided herein is insufficient to support
25 defendant's plea of guilty.

26 19. The United States agrees that, provided (a) all portions of
27 the sentence are at or below the statutory maximum specified above
28 and (b) the Court imposes a term of imprisonment within or above the

1 range corresponding with an offense level of 34 and the criminal
2 history category calculated by the Court, the United States gives up
3 its right to appeal any portion of the sentence with the exception
4 that the United States reserves the right to appeal the amount of
5 restitution ordered if that amount is less than \$20,844,337.

6 RESULT OF WITHDRAWAL OF GUILTY PLEA

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

22 RESULT OF VACATUR, REVERSAL OR SET-ASIDE

23 21. Defendant agrees that if the count of conviction is
24 vacated, reversed, or set aside, both the USAO and defendant will be
25 released from all their obligations under this agreement.
26
27
28

EFFECTIVE DATE OF AGREEMENT

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

BREACH OF AGREEMENT

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

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

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

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

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

17 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

18 OFFICE NOT PARTIES

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

24 26. Defendant understands that both defendant and the United
25 States are free to: (a) supplement the facts by supplying relevant
26 information to the United States Probation and Pretrial Services
27 Office and the Court, (b) correct any and all factual misstatements
28 relating to the Court's Sentencing Guidelines calculations and

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

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

22 NO ADDITIONAL AGREEMENTS

23 28. Defendant understands that, except as set forth herein,
24 there are no promises, understandings, or agreements between the
25 United States and defendant or defendant's attorney, and that no
26 additional promise, understanding, or agreement may be entered into
27 unless in a writing signed by all parties or on the record in court.

28 //

PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

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

AGREED AND ACCEPTED

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

E. MARTIN ESTRADA
United States Attorney

4/26/2024

MAXWELL COLL
NISHA CHANDRAN
Assistant United States Attorneys

Date

STEFANIE SCHWARTZ
Trial Attorney
Criminal Division, Computer Crime
and Intellectual Property Section

LU ZHANG
Defendant

Date

SHAUN KHOJAYAN
Attorney for Defendant LU ZHANG

Date

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. This agreement has been read to me in Mandarin, the language I understand best. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charge and wish to take advantage of the promises set forth in this agreement, and not for any other reason.

Lu Zhang
LU ZHANG
Defendant

4/26/24
Date

CERTIFICATION OF INTERPRETER

I, Samuel Choy am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant LU ZHANG on this date.

Samuel Choy
INTERPRETER4/26/24
DateCERTIFICATION OF DEFENDANT'S ATTORNEY

I am LU ZHANG's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of her rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. To my knowledge: no promises, inducements, or representations of any kind have been made to my client other than those contained in this agreement; no one has threatened or forced my client in any way to enter into this agreement; my client's decision to enter into this agreement is an informed and voluntary one; and the factual basis set forth in this agreement is sufficient to support my client's entry of a guilty plea pursuant to this agreement.

Shaun Khojayan
SHAUN KHOJAYAN
Attorney for Defendant LU ZHANG4/26/24
Date