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8 Attorneys for Plaintiff  
 9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 STEVE JACKSON RODRIGUEZ,

16 Defendant.

No. EDCR 21-0188(B)-JWH-1

AMENDED PLEA AGREEMENT FOR  
 DEFENDANT STEVE JACKSON RODRIGUEZ

17  
 18 1. This constitutes the plea agreement between STEVE JACKSON  
 19 RODRIGUEZ ("defendant") and the United States Attorney's Office for  
 20 the Central District of California (the "USAO") in the above-  
 21 captioned case. This agreement is limited to the USAO and cannot  
 22 bind any other federal, state, local, or foreign prosecuting,  
 23 enforcement, 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 Counts One, Four,  
 28 Five, Six, Seven, Eight, Nine, and Twelve of the Second Superseding

1 Indictment in United States v. Steve Jackson Rodriguez et al., CR 21-  
2 0188(B)-JWH, which charges defendant with:

3 i. Obtaining Custody of a Minor for Purposes of  
4 Producing Child Pornography, in violation of 18 U.S.C. § 2251A(b);

5 ii. Production of Child Pornography, in violation of  
6 18 U.S.C. §§ 2251(a), (e); and

7 iii. Enticement of a Minor to Engage in Criminal  
8 Sexual Activity, in violation of 18 U.S.C. §§ 2422(b).

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

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

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

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

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

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

24 h. Defendant agrees that any and all criminal debt  
25 ordered by the Court will be due in full and immediately. The  
26 government is not precluded from pursuing, in excess of any payment  
27 schedule set by the Court, any and all available remedies by which to  
28

1 satisfy defendant's payment of the full financial obligation,  
2 including referral to the Treasury Offset Program.

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

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

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

18 l. Agree to and not oppose the imposition of lifetime  
19 supervised release containing the following conditions of supervised  
20 release:

21 i. that defendant does not obtain, retain, apply  
22 for, reapply for, or contest the revocation of, his nursing license  
23 or any license to provide medical care for patients.

24 ii. Defendant shall register as a sex offender, and  
25 keep the registration current, in each jurisdiction where defendant  
26 resides, where defendant is an employee, and where defendant is a  
27 student, to the extent the registration procedures have been  
28 established in each jurisdiction. When registering for the first

1 time, defendant shall also register in the jurisdiction in which the  
2 conviction occurred if different from defendant's jurisdiction of  
3 residence. Defendant shall provide proof of registration to the  
4 Probation Officer within three days of defendant's placement on  
5 probation/release from imprisonment.

6           iii. Defendant shall participate in a psychological  
7 counseling and/or psychiatric treatment and/or a sex offender  
8 treatment program, which may include inpatient treatment upon order  
9 of the Court, as approved and directed by the Probation Officer.  
10 Defendant shall abide by all rules, requirements, and conditions of  
11 such program, including submission to risk assessment evaluations and  
12 physiological testing, such as polygraph and Abel testing, but the  
13 defendant retains the right to invoke the Fifth Amendment. The  
14 Probation Officer shall disclose the presentence report and/or any  
15 previous mental health evaluations or reports to the treatment  
16 provider.

17           iv. As directed by the Probation Officer, defendant  
18 shall pay all or part of the costs of treating defendant's  
19 psychological/psychiatric disorder(s) to the aftercare contractor  
20 during the period of community supervision, pursuant to 18 U.S.C.  
21 § 3672. Defendant shall provide payment and proof of payment as  
22 directed by the Probation Officer.

23           v. Defendant shall not view or possess any  
24 materials, including pictures, photographs, books, writings,  
25 drawings, videos, or video games, depicting and/or describing child  
26 pornography, as defined in 18 U.S.C. § 2256(8), or sexually explicit  
27 conduct depicting minors, as defined at 18 U.S.C. § 2256(2). The  
28 defendant shall not possess or view any materials such as videos,

1 magazines, photographs, computer images or other matter that depicts  
2 "actual sexually explicit conduct" involving adults as defined by 18  
3 U.S.C. § 2257(h)(1). This condition does not prohibit defendant from  
4 possessing materials solely because they are necessary to, and used  
5 for, a collateral attack, nor does it prohibit defendant from  
6 possessing materials prepared and used for the purposes of  
7 defendant's Court-mandated sex offender treatment, when defendant's  
8 treatment provider or the probation officer has approved of  
9 defendant's possession of the materials in advance.

10 vi. Defendant shall not associate or have verbal,  
11 written, telephonic, or electronic communication with any person  
12 under the age of 18, except: (a) in the presence of the parent or  
13 legal guardian of said minor; and (b) on the condition that defendant  
14 notifies said parent or legal guardian of defendant's conviction in  
15 the instant offense/prior offense. This provision does not encompass  
16 persons under the age of 18, such as waiters, cashiers, ticket  
17 vendors, etc., with whom defendant must interact in order to obtain  
18 ordinary and usual commercial services.

19 vii. Defendant shall not frequent, or loiter, within  
20 100 feet of school yards, parks, public swimming pools, playgrounds,  
21 youth centers, video arcade facilities, or other places primarily  
22 used by persons under the age of 18.

23 viii. Defendant shall not affiliate with, own,  
24 control, volunteer or be employed in any capacity by a business or  
25 organization that causes defendant to regularly contact persons under  
26 the age of 18.

27 ix. Defendant shall not affiliate with, own, control,  
28 or be employed in any capacity by a business whose principal product

1 is the production or selling of materials depicting or describing  
2 "sexually explicit conduct," as defined at 18 U.S.C. § 2256(2).

3 x. Defendant shall not own, use or have access to  
4 the services of any commercial mail-receiving agency, nor shall  
5 defendant open or maintain a post office box, without the prior  
6 written approval of the Probation Officer.

7 xi. Defendant's employment shall be approved by the  
8 Probation Officer, and any change in employment must be pre-approved  
9 by the Probation Officer. Defendant shall submit the name and  
10 address of the proposed employer to the Probation Officer at least  
11 ten days prior to any scheduled change.

12 xii. Defendant shall not reside within direct view of  
13 school yards, parks, public swimming pools, playgrounds, youth  
14 centers, video arcade facilities, or other places primarily used by  
15 persons under the age of 18. Defendant's residence shall be approved  
16 by the Probation Officer, and any change in residence must be pre-  
17 approved by the Probation Officer. Defendant shall submit the  
18 address of the proposed residence to the Probation Officer at least  
19 ten days prior to any scheduled move.

20 xiii. Defendant shall submit defendant's person,  
21 and any property, house, residence, vehicle, papers, computer, other  
22 electronic communication or data storage devices or media, and  
23 effects to search at any time, with or without warrant, by any law  
24 enforcement or Probation Officer with reasonable suspicion concerning  
25 a violation of a condition of probation/supervised release or  
26 unlawful conduct by defendant, and by any Probation Officer in the  
27 lawful discharge of the officer's supervision function.

28







1 sexually explicit conduct, for the purpose of producing a visual  
2 depiction of the conduct; and

3 c. Either:

4 i. The minor or defendant traveled or was  
5 transported in or affecting interstate or foreign commerce; or

6 ii. The offer was communicated or transported using  
7 any means or facility of interstate or foreign commerce or in or  
8 affecting interstate or foreign commerce by any means including by  
9 computer; or

10 iii. The conduct took place in any territory or  
11 possession of the United States.

12 5. Defendant understands that for defendant to be guilty of  
13 the crime charged in Counts One, Four, Six, Seven, and Nine, that is,  
14 Production of Child Pornography, in violation of 18 U.S.C.  
15 §§ 2251(a), (e), the following must be true:

16 a. At the time of the offense, the victim was under the  
17 age of 18 years old;

18 b. Defendant employed, used, persuaded, or coerced the  
19 victim to take part in sexually explicit conduct for the purpose of  
20 producing a visual depiction of such conduct; and

21 c. Either:

22 i. Defendant knew or had reason to know that the  
23 visual depiction would be mailed or transported across state lines or  
24 in foreign commerce; or

25 ii. The visual depiction was produced using materials  
26 that had been mailed, shipped, or transported across state lines or  
27 in foreign commerce; or

28

1                   iii. The visual depiction was mailed or actually  
2 transported across state lines or in foreign commerce; or  
3 The visual depiction affected interstate commerce.

4           6. Defendant understands that for defendant to be guilty of  
5 the crime charged in Count Twelve, that is, Enticement of a Minor to  
6 Engage in Criminal Sexual Activity, in violation of 18 U.S.C.  
7 §§ 2422(b) the following must be true:

8           a. Defendant used a means or facility of interstate or  
9 foreign commerce to knowingly persuade, induce, entice, or coerce an  
10 individual to engage in criminal sexual conduct; and

11           b. If the sexual activity had occurred, the defendant  
12 could have been charged with a criminal offense under the laws of  
13 California. In California, it is a criminal offense to engage in:

14           i. Statutory Rape of a minor under the age of 16  
15 when the perpetrator is over 21 years old, in violation of California  
16 Penal Code, Section 261.5(d); and

17           ii. Lewd Acts with a Minor Child of 14 or 16 years  
18 old, in violation of California Penal Code, Section 288(c)(1); and

19           c. The individual defendant persuaded, induced, enticed,  
20 or coerced was under the age of 18.

21   PENALTIES AND RESTITUTION

22           7. Defendant understands that the statutory maximum sentence  
23 that the Court can impose for each violation of 18 U.S.C. §§ 2251A(b)  
24 is: lifetime imprisonment; a lifetime period of supervised release; a  
25 fine of \$250,000 or twice the gross gain or gross loss resulting from  
26 the offense, whichever is greatest; and a mandatory special  
27 assessment of \$100.

28

1           8. Defendant understands that the statutory mandatory minimum  
2 sentence that the Court must impose for each violation of Title 18,  
3 United States Code, Sections 2251A(b) is: 30 years' imprisonment; a  
4 five-year period of supervised release; and a mandatory special  
5 assessment of \$100.

6           9. Defendant understands that the statutory maximum sentence  
7 that the Court can impose for each violation of 18 U.S.C. §§ 2251(a),  
8 (e) is: 30 years' imprisonment; a lifetime period of supervised  
9 release; a fine of \$250,000 or twice the gross gain or gross loss  
10 resulting from the offense, whichever is greatest; and a mandatory  
11 special assessment of \$100.

12           10. Defendant understands that the statutory mandatory minimum  
13 sentence that the Court must impose for each violation of Title 18,  
14 United States Code, Sections 2251(a), (e) is: 15 years' imprisonment;  
15 a five-year period of supervised release; and a mandatory special  
16 assessment of \$100.

17           11. Defendant understands that the statutory maximum sentence  
18 that the Court can impose for each violation of 18 U.S.C. §§ 2422(b)  
19 is: lifetime imprisonment; a lifetime period of supervised release; a  
20 fine of \$250,000 or twice the gross gain or gross loss resulting from  
21 the offense, whichever is greatest; and a mandatory special  
22 assessment of \$100.

23           12. Defendant understands that the statutory mandatory minimum  
24 sentence that the Court must impose for each violation of Title 18,  
25 United States Code, Sections 2422(b) is: 10 years' imprisonment; a  
26 five-year period of supervised release; and a mandatory special  
27 assessment of \$100.

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1           13. Defendant understands that the total maximum sentence for  
2 all offenses to which defendant is pleading guilty is: lifetime  
3 imprisonment; a lifetime period of supervised release; a fine of  
4 \$1,750,000 or twice the gross gain or gross loss resulting from the  
5 offenses, whichever is greatest; and eight mandatory special  
6 assessments of \$100.

7           14. Defendant understands that the total minimum sentence for  
8 all offenses to which defendant is pleading guilty is: 30 years  
9 imprisonment; a five-year period of supervised release; and mandatory  
10 special assessments of \$800.

11           15. Defendant also understands that, pursuant to the Justice  
12 for Victims of Trafficking Act of 2015, the Court shall impose an  
13 additional \$5,000 special assessment per count of conviction in this  
14 case, if the Court concludes that defendant is a non-indigent person,  
15 to be paid after defendant's other financial obligations have been  
16 satisfied.

17           16. Defendant understands that, pursuant to the Amy, Vicky, and  
18 Andy Child Pornography Victim Assistance Act of 2018 found in 18  
19 U.S.C. § 2259A, the Court may impose an additional special assessment  
20 of up to \$50,000 per count of conviction for Production of Child  
21 Pornography and Obtaining Custody of a Minor for Purposes of  
22 Producing Child Pornography.

23           17. 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 18. Defendant understands that as a condition of supervised  
4 release, under Title 18, United States Code, Section 3583(d),  
5 defendant will be required to register as a sex offender. Defendant  
6 understands that independent of supervised release, he will be  
7 subject to federal and state registration requirements, for a  
8 possible maximum term of registration up to and including life.  
9 Defendant further understands that, under Title 18, United States  
10 Code, Section 4042(c), notice will be provided to certain law  
11 enforcement agencies upon his release from confinement following  
12 conviction

13 19. Defendant understands that defendant will be required to  
14 pay full restitution to the victim(s) of the offense to which  
15 defendant is pleading guilty. Defendant agrees that, in return for  
16 the USAO's compliance with its obligations under this agreement, the  
17 Court may order restitution to persons other than the victim(s) of  
18 the offense to which defendant is pleading guilty and in amounts  
19 greater than those alleged in the count to which defendant is  
20 pleading guilty. In particular, defendant agrees that the Court may  
21 order restitution to any victim of any of the following for any  
22 losses suffered by that victim as a result: (a) any relevant conduct,  
23 as defined in U.S.S.G. § 1B1.3, in connection with the offense to  
24 which defendant is pleading guilty; and (b) any count dismissed and  
25 charges not prosecuted pursuant to this agreement as well as all  
26 relevant conduct, as defined in U.S.S.G. § 1B1.3, in connection with  
27 those charges and count.

28

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

14           21. Defendant and his counsel have discussed the fact that, and  
15 defendant understands that, if defendant is not a United States  
16 citizen, the convictions in this case makes it practically inevitable  
17 and a virtual certainty that defendant will be removed or deported  
18 from the United States. Defendant may also be denied United States  
19 citizenship and admission to the United States in the future.  
20 Defendant understands that while there may be arguments that  
21 defendant can raise in immigration proceedings to avoid or delay  
22 removal, removal is presumptively mandatory and a virtual certainty  
23 in this case. Defendant further understands that removal and  
24 immigration consequences are the subject of a separate proceeding and  
25 that no one, including his attorney or the Court, can predict to an  
26 absolute certainty the effect of his convictions on his immigration  
27 status. Defendant nevertheless affirms that he wants to plead guilty  
28

1 regardless of any immigration consequences that his pleas may entail,  
2 even if the consequence is automatic removal from the United States.

3 FACTUAL BASIS

4 22. Defendant admits that defendant is, in fact, guilty of the  
5 offenses to which defendant is agreeing to plead guilty. Defendant  
6 and the USAO agree to the statement of facts provided below and agree  
7 that this statement of facts is sufficient to support a plea of  
8 guilty to the charges described in this agreement but is not meant to  
9 be a complete recitation of all facts relevant to the underlying  
10 criminal conduct or all facts known to either party that relate to  
11 that conduct.

12 **A. Defendant's Sexual Abuse of Minor Victims 1, 2, and 4**  
13 **(Counts One and Four Through Nine)**

14 From at least January 10, 2016, through January 27, 2018,  
15 defendant produced child pornography of his sexual conduct with three  
16 mentally and physically disabled children in his custody and care.  
17 From 2014 to 2016, in March 2017, and from December 2017 to January  
18 2018, defendant was employed as a Certified Nursing Assistant at a  
19 group home for disabled children and adults in Chino, California (the  
20 "Group Home"), which is within the Central District of California.

21 Typically, defendant's role at the Group Home was to be the sole  
22 night-time care giver for approximately six mentally and physically  
23 disabled minor residents in the minor resident building. These  
24 disabled minor residents in his care included Minor Victim 1, Minor  
25 Victim 2, and Minor Victim 4. Defendant typically worked the  
26 nocturnal shift (midnight to 6:00 a.m.), at defendant's request.  
27 Typically, defendant worked this shift alone. The nocturnal shift  
28

1 was typically staffed with only one person, whereas the daytime  
2 shifts tended to have more employees present.

3 Among defendant's duties, defendant was entrusted with the  
4 safety, wellbeing, and medical care for Minor Victim 1, Minor Victim  
5 2, and Minor Victim 4.

6 While employed at the Group Home defendant engaged in sexual  
7 conduct with Minor Victim 1, Minor Victim 2, and Minor Victim 4 and  
8 filmed some of this sexual conduct. Defendant also distributed files  
9 depicting his sexual abuse of Minor Victim 1 and discussed his sexual  
10 interest in children with numerous other individuals he met on the  
11 internet. Defendant also distributed files depicting his sexual  
12 abuse of Minor Victim 1 to local individuals he knew offline,  
13 including co-defendant Registered Nurse CYR BANGUGUILAN  
14 ("BANGUGUILAN") and co-defendant MIGUEL BOCARDO ("BOCARDO") on  
15 Telegram.

16 Defendant and BANGUGUILAN knew each other socially from work.  
17 At some point defendant and BANGUGUILAN began discussing defendant's  
18 sexual interest in children on Telegram. On one occasion,  
19 BANGUGUILAN told defendant "Nice. I saw the girl with your cock."  
20 Defendant responded "Ya she cute little thing. Have lots."  
21 Defendant and BANGUGUILAN were discussing files defendant distributed  
22 to BANGUGUILAN depicting defendant sexually abusing Minor Victim 1.  
23 Defendant told BANGUGUILAN that he had access to children that he  
24 sexually abused. Defendant sent multiple files to BANGUGUILAN  
25 depicting child pornography of Minor Victim 1.

26 Defendant distributed a file to BANGUGUILAN depicting defendant  
27 inserting his penis into Minor Victim's 1's anus, with the message "I  
28 put it in her butt" followed by two water drop emojis and a fire



1 emoji. This file appears to match one of the files defendant  
2 produced on January 27, 2018. In total, defendant sent BANGUGUILAN  
3 approximately 10-20 videos of defendant sexually abusing minor  
4 victims, including Minor Victim 1.

5 Defendant also sent sexual abuse images to his local friend  
6 BOCARDO. On Telegram, defendant told BOCARDO that he routinely  
7 engaged in sexual conduct with children at the Group Home he worked  
8 at, invited BOCARDO to engage in sexual acts with Minor Victim 1,  
9 sent BOCARDO files depicting defendant's sexual acts with Minor  
10 Victim 1, and admitted that he would sometimes bribe the children at  
11 the Group Home with candy bars to facilitate his sexual abuse.

12 Defendant's most recent sexual chat about sexual activity with  
13 children with both BOCARDO and BANGUGUILAN occurred on August 24,  
14 2021. Defendant was arrested in this case on August 25, 2021.

15 1. Minor Victim 1

16 Minor Victim 1 was placed in the Group Home to be cared for  
17 since at least 2015. According to her medical records, of which  
18 defendant had access, Minor Victim 1 had severe mental disabilities  
19 and required the use of a colostomy bag. Minor Victim 1 was largely  
20 non-verbal at the time defendant started abusing her, and to this day  
21 has very limited verbal abilities.

22 When the first documented abuse by defendant of Minor Victim 1  
23 in January 2016 occurred, Minor Victim 1 was approximately 6 years  
24 old. The latest document abuse of Minor Victim 1 by defendant  
25 occurred in January 2018, when she was approximately 8 years old.

26 Defendant knew Minor Victim 1 was between 6 and 8 years old from  
27 January 2016 to January 2018 from both his observation at the time of  
28

1 the abuse and from her medical records, of which he had access to and  
2 looked at for his work.

3 2. Minor Victim 2

4 Minor Victim 2 was placed in the Group Home in at least 2013.  
5 Minor Victim 2 has been diagnosed with severe mental disabilities  
6 developed as a result of major trauma suffered when she was  
7 approximately 3 years old. Minor Victim 2 requires the use of a  
8 feeding tube and a wheelchair. Minor Victim 2 is largely non-verbal.  
9 At the time defendant created the child pornography of Minor Victim  
10 2, Minor Victim 2 was approximately 12 years old. Defendant knew  
11 Minor Victim 2 was approximately 12 years old in January 2018 both  
12 from his observation at the time of the abuse and from her medical  
13 records which included her date of birth, of which he had access to  
14 and looked at for his work.

15 3. Minor Victim 4

16 Minor Victim 4 was admitted to the Group Home in at least 2008.  
17 Minor Victim 4 has severe mental disabilities and is non-verbal.  
18 Minor Victim 4 is also deaf and blind. Minor Victim 4 is confined to  
19 a wheelchair, and typically wears a diaper. In March 2017, Minor  
20 Victim 4 was 17 years old. Defendant knew that Minor Victim 4 was  
21 not yet 18 years old because he reviewed her medical records which  
22 included her date of birth, of which he had access to and looked at  
23 for work.

24 a. *January 10, 2016*

25 On January 10, 2016 (Count 1), defendant created child  
26 pornography of Minor Victim 1's vagina with defendant's penis  
27 positioned approximately 2 inches from her vagina. Minor Victim 1's  
28 colostomy bag and urination pad were visible in the image. This file

1 is titled: "663c5bd871bc97cff0fe0be455414f6d1.0-1.jpg." Defendant  
2 admits that this file was child pornography which was produced using  
3 materials that had been transported in interstate or foreign commerce,  
4 and this visual depiction affected interstate and foreign commerce.  
5 Defendant admits that he produced this file using a Samsung Galaxy S5  
6 cellular phone and transferred it to his LG G6 cellular phone. Samsung  
7 and LG are Korean company for which components for their Samsung Galaxy  
8 S5 and LG G6 cellular phones and the cellular phones themselves are  
9 materials transported in foreign commerce.

10 *b. March 15, 2017*

11 On March 15, 2017 (Count 4), defendant produced at least two  
12 videos of child pornography depicting defendant anally penetrating  
13 Minor Victim 4 with his penis while Minor Victim 4 is face down on  
14 the tile floor of the bathroom at the Group Home. These files are  
15 titled "20170315\_014555.mp4" and "20170315\_014749.mp4." In one of  
16 the videos RODRIGUEZ identifies Minor Victim 4 by name and identifies  
17 that he is having anal sex with Minor Victim 4. Defendant uploaded  
18 these files onto his Google Cloud account via the internet, which  
19 means the files moved in and affected interstate and foreign  
20 commerce. Defendant also admits that these visual depictions  
21 affected interstate and foreign commerce.

22 *c. December 2017 to January 2018*

23 Except for a few days in March 2017, defendant largely did not  
24 work at the Group Home on any regular basis from 2016 to until  
25 December 2017.

26 In December 2017, defendant communicated by cellular telephone,  
27 an instrumentality of interstate commerce, with the administrator of  
28

1 the Group Home. Defendant's cellphone provider was Sprint, a  
2 telecommunication provider that operated in interstate commerce.

3 In these cellular telephone communications with the Group Home  
4 provider, defendant asked to return to work at the Group Home to work  
5 overnight shifts at the Group Home. One of defendant's primary and  
6 predominate purposes in re-establishing this employment was to gain  
7 custody/control over the minors at the Group Home to create child  
8 pornography depicting Minor Victim 1 and Minor Victim 2 engaged in  
9 sexual acts with defendant. Furthermore, these communications  
10 ultimately resulted in defendant regaining custody and control over  
11 Minor Victim 1 and 2 for the primary purpose of producing child  
12 pornography depicting them both on January 1.

13 Defendant engaged in further cellular telephone communications  
14 with the Group Home provider to obtain custody/control over the  
15 minors at the Group Home on January 27, 2018, for which one of  
16 defendant's primary and predominate purposes was to producing child  
17 pornography of Minor Victim 1. Defendant ultimately was successful  
18 in regaining custody/control over Minor Victim 1 on January 27, 2018  
19 and was able to produce child pornography depicting Minor Victim 1.

20 On January 1, 2018 (Counts 5 and 6), defendant produced over a  
21 dozen child pornography video files and images depicting his sexual  
22 assault of Minor Victim 1 and Minor Victim 2 between approximately  
23 12:52 a.m. to 04:11 a.m. Defendant's child pornography on this date  
24 of Minor Victim 1 included but is not limited to the following files:  
25 a video file depicting defendant pulling back Minor Victim 1's onesie  
26 and exposing her vagina and anus titled "20180101\_005258.mp4;" a  
27 video file depicting defendant forcing Minor Victim 1's head down to  
28 his genital area to engage in oral copulation of defendant's penis

1 while defendant said "suck on it," titled "20180101\_005747.mp4;" a  
2 video file depicting defendant orally copulating Minor Victim 1,  
3 titled "20180101\_010134.mp4;" and a video file which depicted  
4 defendant rubbing the inside folds of Minor Victim 1's vagina with  
5 the head of his penis, titled "20180101\_041109.mp4." Defendant  
6 admits that all of these visual depictions affected interstate and  
7 foreign commerce.

8 Defendant uploaded the "20180101\_005747.mp4" and  
9 "20180101\_010134.mp4" files onto his Google Cloud account via the  
10 internet, which means the files moved in and affected interstate and  
11 foreign commerce.

12 On January 1, 2018 (Counts 5 and 7) defendant also filmed his  
13 abuse of Minor Victim 2. In one video, defendant filmed himself  
14 penetrating Minor Victim 2 with his penis. This file was titled,  
15 "20180101\_014805.mp4."

16 On January 27, 2018 (Count 9), defendant produced at least four  
17 videos of child pornography depicting defendant sexually abusing  
18 Minor Victim 1. Defendant produced the following videos that day:  
19 two videos of defendant performing oral copulation on Minor Victim 1  
20 titled "20180127\_011432.mp4," and "20 180127\_011654.mp4;" a video of  
21 defendant attempting to touch his penis to Minor Victim 1's anus  
22 titled "20180127\_011802.mp4;" and a video of defendant touching his  
23 penis to Minor Victim 1's anus titled "20180127\_011903.mp4."

24 On January 27, 2018, defendant's shift was to work from 12 a.m.  
25 to 6 a.m. when his relief was scheduled to arrive. Defendant arrived  
26 shortly after 12 a.m., produced child pornography, then before 2:00  
27 a.m. defendant abandoned the Group Home residents without care,  
28

1 including Minor Victim 1. Defendant left within an hour of the  
2 completion of his production of child pornography of Minor Victim 1.

3 Defendant admits that the files titled: "20180101\_005258.mp4,"  
4 "20180101\_041109.mp4," "20180101\_014805.mp4," "20180127\_011432.mp4,"  
5 "20180127\_011654.mp4," "20180127\_011802.mp4," and  
6 "20180127\_011903.mp4" were files of child pornography produced using  
7 materials that had been transported in interstate or foreign  
8 commerce, and these visual depiction affected interstate and foreign  
9 commerce. Defendant admits that he produced these files using an LG  
10 G6 cellular phone.

11 **B. Defendant's Sexual Abuse of Minor Victim 3 (Count 12)**

12 From an unknown date to at least June 24, 2020, defendant used  
13 the internet, a cellular telephone, and internet chat applications on  
14 a cellular telephone, all of which are facilities and means of  
15 interstate and foreign commerce, to persuade, entice, and induce  
16 Minor Victim 3 into engaging in criminal sexual acts with defendant.  
17 At the time of these communications, defendant knew that Minor Victim  
18 3 was under the age of 18 and believed that she was approximately 15  
19 years old.

20 Defendant knew that he was persuading, enticing, and inducing  
21 Minor Victim 3 into engaging in Statutory Rape of a Minor Under the  
22 age of 16 with a Perpetrator Over the Age of 21, and Lewd Acts with a  
23 Minor Child of 14 or 15 years old, in violation of California law.

24 Specifically, on November 25, 2019, defendant, using an internet  
25 messaging application on his phone, told Minor Victim 3 he wanted to  
26 have sex with her without a condom and that he would "pull out"  
27 meaning not ejaculate inside her. Minor Victim 3 was 15 at the time  
28 of this chat.

1 On June 24, 2020, defendant, using an internet messaging  
2 application on his phone called Text Free, told Minor Victim 3 that  
3 he would have sex with Minor Victim 3 on Friday.

4 Defendant also made multiple videos later found by law  
5 enforcement of defendant having sex with Minor Victim 3 when she was  
6 approximately 15 years old. On December 8, 2019, defendant filmed  
7 defendant having intercourse with Minor Victim 3 in defendant's car.  
8 On May 1, 2020, defendant filmed a video of himself orally copulating  
9 Minor Victim 3 and having vaginal intercourse with Minor Victim 3 in  
10 a hotel room.

11 SENTENCING FACTORS

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

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

26 Production Of Child Pornography

27 **Count 1**

28 Base Offense Level: 32 U.S.S.G. § 2G2.1(a)

1 Specific Offense Characteristics:

2 Custody/supervisory control (Minor Victim 1):

3 +2 U.S.S.G. § 2G2.1(b) (5)

4 Minor Under Twelve: +4 U.S.S.G. § 2G2.1(b) (1) (A)

5 Victim Related Adjustments:

6 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)

7 Defendant Role in Offense:

8 Abuse of Position of Trust:

9 +2 U.S.S.G. § 3B1.3

10 **Total Offense Level: 42**

11  
12 **Count 4**

13 Base Offense Level: 32 U.S.S.G. § 2G2.1(a)

14 Specific Offense Characteristics:

15 Custody/supervisory control (Minor Victim 4):

16 +2 U.S.S.G. § 2G2.1(b) (5)

17 Sexual Act/Contact: +2 U.S.S.G. § 2G2.1(b) (2) (A)

18 Sadistic Conduct: +4 U.S.S.G. § 2G2.1(b) (4) (A)

19 Victim Related Adjustments:

20 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)

21 Defendant Role in Offense:

22 Abuse of Position of Trust:

23 +2 U.S.S.G. § 3B1.3

24 **Total Offense Level: 44**

25  
26 **Count 6**

27 Base Offense Level: 32 U.S.S.G. § 2G2.1(a)

28 Specific Offense Characteristics:



1 Custody/supervisory control (Minor Victim 1):  
2 +2 U.S.S.G. § 2G2.1(b) (5)  
3 Minor Under Twelve: +4 U.S.S.G. § 2G2.1(b) (1) (A)  
4 Sexual Contact: +2 U.S.S.G. § 2G2.1(b) (2) (A)  
5 Victim Related Adjustments:  
6 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)  
7 Restrained Victim: +2 U.S.S.G. § 3A1.3  
8 Defendant Role in Offense:  
9 Abuse of Position of Trust:  
10 +2 U.S.S.G. § 3B1.3  
11 **Total Offense Level: 46**

13 **Count 7**

14 Base Offense Level: 32 U.S.S.G. § 2G2.1(a)  
15 Specific Offense Characteristics:  
16 Custody/supervisory control (Minor Victim 2):  
17 +2 U.S.S.G. § 2G2.1(b) (5)  
18 Minor Twelve to Sixteen:  
19 +2 U.S.S.G. § 2G2.1(b) (1) (B)  
20 Sexual Contact: +2 U.S.S.G. § 2G2.1(b) (2) (A)  
21 Victim Related Adjustments:  
22 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)  
23 Defendant Role in Offense:  
24 Abuse of Position of Trust:  
25 +2 U.S.S.G. § 3B1.3  
26 **Total Offense Level: 42**

28

1 **Count 9**

2 Base Offense Level: 32 U.S.S.G. § 2G2.1(a)

3 Specific Offense Characteristics:

4 Custody/supervisory control (Minor Victim 1):

5 +2 U.S.S.G. § 2G2.1(b) (5)

6 Distribution: +2 U.S.S.G. § 2G2.1(b) (3)

7 Minor Under 12: +4 U.S.S.G. § 2G2.1(b) (1) (A)

8 Sexual Contact: +2 U.S.S.G. § 2G2.1(b) (2) (A)

9 Sadistic Conduct: +4 U.S.S.G. § 2G2.1(b) (4) (A)

10 Victim Related Adjustments:

11 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)

12 Defendant Role in Offense:

13 Abuse of Position of Trust:

14 +2 U.S.S.G. § 3B1.3

15 **Total Offense Level: 50**

16

17 **Obtaining Custody of Child to Produce Child Pornography**

18 **Count 5**

19 Base Offense Level: 38 U.S.S.G. § 2G2.3(a)

20 Victim Related Adjustments:

21 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)

22 Defendant Role in Offense:

23 Abuse of Position of Trust:

24 +2 U.S.S.G. § 3B1.3

25 **Total Offense Level: 42**

26

27 **Count 8**

28 Base Offense Level: 38 U.S.S.G. § 2G2.3(a)

1 Victim Related Adjustments:  
 2 Vulnerable Victim: +2 U.S.S.G. § 3A1.1(b) (1)  
 3 Defendant Role in Offense:  
 4 Abuse of Position of Trust:  
 5 +2 U.S.S.G. § 3B1.3  
 6 **Total Offense Level: 42**

8 **Enticement**

9 **Count 12**

10 Base Offense Level: 28 U.S.S.G. § 2G1.3(a) (3)  
 11 Specific Offense Characteristics:  
 12 Use of Computer: +2 U.S.S.G. § 2G1.3(b) (3) (A)  
 13 Sex Act/Contact: +2 U.S.S.G. § 2G1.3(b) (4) (A)  
 14 **Total Offense Level: 32**

15 25. Defendant and the USAO reserve the right to argue that  
 16 additional specific offense characteristics, adjustments, and  
 17 departures under the Sentencing Guidelines are appropriate.

18 26. Defendant understands that there is no agreement as to  
 19 defendant's criminal history or criminal history category.

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

24 **WAIVER OF CONSTITUTIONAL RIGHTS**

25 28. Defendant understands that by pleading guilty, defendant  
 26 gives up the following rights:

- 27 a. The right to persist in a plea of not guilty.
- 28 b. The right to a speedy and public trial by jury.

1 c. The right to be represented by counsel -- and if  
2 necessary have the Court appoint counsel -- at trial. Defendant  
3 understands, however, that, defendant retains the right to be  
4 represented by counsel -- and if necessary have the Court appoint  
5 counsel -- at every other stage of the proceeding.

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

9 e. The right to confront and cross-examine witnesses  
10 against defendant.

11 f. The right to testify and to present evidence in  
12 opposition to the charges, including the right to compel the  
13 attendance of witnesses to testify.

14 g. The right not to be compelled to testify, and, if  
15 defendant chose not to testify or present evidence, to have that  
16 choice not be used against defendant.

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

20 WAIVER OF APPEAL OF CONVICTION

21 29. Defendant understands that, with the exception of an appeal  
22 based on a claim that defendant's guilty plea was involuntary, by  
23 pleading guilty defendant is waiving and giving up any right to  
24 appeal defendant's convictions on the offenses to which defendant is  
25 pleading guilty. Defendant understands that this waiver includes,  
26 but is not limited to, arguments that the statutes to which defendant  
27 is pleading guilty are unconstitutional, and any and all claims that  
28

1 the statement of facts provided herein is insufficient to support  
2 defendant's plea of guilty.

3 WAIVER OF APPEAL AND COLLATERAL ATTACK

4 30. Defendant gives up the right to appeal all of the  
5 following: (a) the procedures and calculations used to determine and  
6 impose any portion of the sentence; (b) the term of imprisonment  
7 imposed by the Court, including, to the extent permitted by law, the  
8 constitutionality or legality of defendant's sentence, provided it is  
9 within the statutory maximum; (c) the fine imposed by the Court,  
10 provided it is within the statutory maximum; (d) the amount and terms  
11 of any restitution order; (e) the term of probation or supervised  
12 release imposed by the Court, provided it is within the statutory  
13 maximum; and (f) any of the following conditions of probation or  
14 supervised release imposed by the Court: the conditions set forth in  
15 Second Amended General Order 20-04 of this Court; the drug testing  
16 conditions mandated by 18 U.S.C. §§ 3563(a)(5) and 3583(d); the  
17 alcohol and drug use conditions authorized by 18 U.S.C. § 3563(b)(7);  
18 and and any conditions of probation or supervised release agreed to  
19 by defendant in paragraph 2.1 above.

20 31. Defendant also gives up any right to bring a post-  
21 conviction collateral attack on the convictions or sentence,  
22 including any order of restitution, except a post-conviction  
23 collateral attack based on a claim of ineffective assistance of  
24 counsel, a claim of newly discovered evidence, or an explicitly  
25 retroactive change in the applicable Sentencing Guidelines,  
26 sentencing statutes, or statutes of conviction. Defendant  
27 understands that this waiver includes, but is not limited to,  
28 arguments that the statutes to which defendant is pleading guilty are

1 unconstitutional, and any and all claims that the statement of facts  
2 provided herein is insufficient to support defendant's pleas of  
3 guilty.

4 32. This agreement does not affect in any way the right of the  
5 USAO to appeal the sentence imposed by the Court.

6 RESULT OF WITHDRAWAL OF GUILTY PLEA

7 33. 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 USAO will be relieved of all of its  
12 obligations under this agreement; and (b) should the USAO choose to  
13 pursue any charge that was either dismissed or not filed as a result  
14 of this agreement, then (i) any applicable statute of limitations  
15 will be tolled between the date of defendant's signing of this  
16 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 34. Defendant agrees that if any count of conviction is  
24 vacated, reversed, or set aside, the USAO may: (a) ask the Court to  
25 resentence defendant on any remaining counts of conviction, with both  
26 the USAO and defendant being released from any stipulations regarding  
27 sentencing contained in this agreement, (b) ask the Court to void the  
28 entire plea agreement and vacate defendant's guilty pleas on any

1 remaining counts of conviction, with both the USAO and defendant  
2 being released from all their obligations under this agreement, or  
3 (c) leave defendant's remaining convictions, sentence, and plea  
4 agreement intact. Defendant agrees that the choice among these three  
5 options rests in the exclusive discretion of the USAO.

6 EFFECTIVE DATE OF AGREEMENT

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

10 BREACH OF AGREEMENT

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

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

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 38. 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 39. 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. While this paragraph permits both  
7 the USAO and defendant to submit full and complete factual  
8 information to the United States Probation and Pretrial Services  
9 Office and the Court, even if that factual information may be viewed  
10 as inconsistent with the facts agreed to in this agreement, this  
11 paragraph does not affect defendant's and the USAO's obligations not  
12 to contest the facts agreed to in this agreement.

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

23 NO ADDITIONAL AGREEMENTS

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

PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

42. 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

STEPHANIE CHRISTENSEN  
Acting United States Attorney

*Scott M. Lara*

10/7/22

SCOTT M. LARA  
Assistant United States Attorney

Date

*Steve Jackson*

9/28/22

STEVE JACKSON RODRIGUEZ  
Defendant

Date

*George Karl Rosenshock*

9/28/22

~~JARED OLEN~~ GEORGE KARL ROSENSTOCK  
Attorney for Defendant STEVE  
JACKSON RODRIGUEZ

Date

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. 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

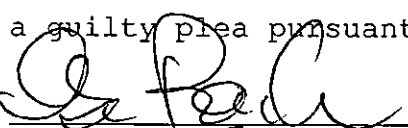
1 representations of any kind have been made to me other than those  
2 contained in this agreement. No one has threatened or forced me in  
3 any way to enter into this agreement. I am satisfied with the  
4 representation of my attorney in this matter, and I am pleading  
5 guilty because I am guilty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

8   
9 \_\_\_\_\_  
10 STEVE JACKSON RODRIGUEZ  
11 Defendant

\_\_\_\_\_ 9/28/22  
Date

11 CERTIFICATION OF DEFENDANT'S ATTORNEY

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

26   
27 ~~JARED OLEN~~ GEORGE KARL ROSENSTOCK  
28 Attorney for Defendant  
STEVE JACKSON RODRIGUEZ

\_\_\_\_\_ 9/28/22  
Date