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JUDGE VIRGINIA M. KENDALL
U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

No. 16 CR 719

v.

Judge Virginia Kendall

WILLIAM WHITLEY, a/k/a "Will" and
"Willie"

PLEA AGREEMENT

1. This Plea Agreement between the United States Attorney for the Northern District of Illinois, JOHN R. LAUSCH, JR., and defendant WILLIAM WHITLEY, and his attorney, STANDISH WILLIS, is made pursuant to Rule 11 of the Federal Rules of Criminal Procedure and is governed in part by Rule 11(c)(1)(A), as more fully set forth below. The parties to this Agreement have agreed upon the following:

Charges in This Case

2. The superseding indictment in this case charges defendant with sex trafficking of a minor, in violation of Title 18, United States Code, Section 1591(a)(1) (Counts One – Four), and production of child pornography, in violation of Title 18, United States Code, Section 2251(a) (Count Five).

3. Defendant has read the charges against him contained in the superseding indictment, and those charges have been fully explained to him by his attorney.

4. Defendant fully understands the nature and elements of the crimes with which he has been charged.

Charges to Which Defendant Is Pleading Guilty

5. By this Plea Agreement, defendant agrees to enter a voluntary plea of guilty to the following count of the superseding indictment: Count One, which charges defendant with sex trafficking of a minor, in violation of Title 18, United States Code, Section 1591(a)(1).

Factual Basis

6. Defendant will plead guilty because he is in fact guilty of the charge contained in Count One of the superseding indictment. In pleading guilty, defendant admits the following facts and that those facts establish his guilt beyond a reasonable doubt and constitute relevant conduct pursuant to Guideline § 1B1.3:

From in or about June 2015, and continuing through on or about September 17, 2015, in the Northern District of Illinois, Eastern Division, and elsewhere, defendant WILLIAM WHITLEY, a/k/a "Will" and "Willie," in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited by any means a person, namely, Minor A, having had a reasonable opportunity to observe Minor A, and knowing and in reckless disregard of the fact that Minor A had not attained the age of 18 years, and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1).

Specifically, in or about June 2015, WHITLEY met Minor A through Individual A. After meeting Minor A, WHITLEY obtained, maintained, patronized, and solicited commercial sex acts from Minor A on multiple occasions between approximately June 2015 and September 17, 2015. Each time WHITLEY engaged in commercial sex acts with Minor A, the sex acts occurred at WHITLEY's apartment in Chicago, Illinois, and WHITLEY paid Minor A approximately \$60 to \$150 in exchange for the sex acts. When WHITLEY wanted to engage in commercial sex acts with Minor A, WHITLEY communicated with Minor A by text message and asked Minor A to come to his apartment, usually before WHITLEY had to go to work in the early afternoon. WHITLEY was a police officer with the Chicago Police Department. WHITLEY told Minor A that he was a police officer and kept his police uniform hanging up in his apartment on his bedroom door. WHITLEY also at times kept a loaded firearm under his pillow on the bed at his apartment where he engaged in commercial sex acts with Minor A.

In or about July 2015, during a meeting with Minor A to engage in commercial sex acts, WHITLEY used his Samsung cellular smart phone to take several sexually explicit photographs of Minor A in which Minor A's genitalia were exposed. After taking the sexually explicit photographs, WHITLEY sent them to Minor A via text message from WHITLEY's Samsung cellular phone.

WHITLEY had the opportunity to observe Minor A each time that Minor A came to his apartment in 2015 to engage in commercial sex acts. WHITLEY observed

that Minor A had braces on her teeth. WHITLEY recklessly disregarded the fact that Minor A was under the age of 18 years. WHITLEY acknowledges that, at the time that WHITLEY engaged in commercial sex acts with Minor A in 2015, Minor A was 14 years old.

WHITLEY used condoms during the commercial sex acts with Minor A, which typically were Trojan brand or LifeStyles brand condoms. WHITLEY acknowledges that Trojan condoms and LifeStyles condoms are manufactured outside the state of Illinois.

In addition to Minor A, WHITLEY, in and affecting interstate commerce, knowingly obtained and maintained other minors for the purpose of engaging in commercial sex acts with them, including Minors B, C, and D. At the time WHITLEY engaged in commercial sex acts with Minors B, C, and D, he was a Chicago Police Department officer. More specifically, WHITLEY paid Minor B to engage in sex acts with him on multiple occasions in or about 2014. WHITLEY acknowledges that, at the time he engaged in commercial sex acts with Minor B, Minor B was approximately 16 years old. WHITLEY paid Minor C to engage in sex acts with him on multiple occasions from in or about June 2015 through 2016. WHITLEY acknowledges that, at the time he engaged in commercial sex acts with Minor C, Minor C was approximately 17 years old. WHITLEY paid Minor D to engage in commercial sex acts with him on multiple occasions from in or about 2012 through 2015. WHITLEY acknowledges that, when he began engaging in commercial sex acts with Minor D,

Minor D was approximately 14 or 15 years old. WHITLEY had the opportunity to observe Minors B, C, and D, and recklessly disregarded the fact that these minors were under the age of 18 at the time he engaged in commercial sex acts with them. WHITLEY communicated with Minors B, C, and D by cellular smart phone to arrange meetings with them at his apartment in Chicago, and elsewhere, for the purpose of engaging in commercial sex acts with Minors B, C, and D.

Maximum Statutory Penalties

7. Defendant understands that the charge to which he is pleading guilty carries the following statutory penalties:

a. A maximum sentence of life imprisonment, and a statutory mandatory minimum sentence of 10 years, as set forth in Title 18, United States Code, Section 1591(b)(2). Pursuant to Title 18, United States Code, Section 3561, defendant may not be sentenced to a term of probation on this count. This offense also carries a maximum fine of \$250,000. Defendant further understands that the judge also must impose a term of supervised release of at least five years, and up to any number of years, including life.

b. Defendant further understands that the Court must order restitution to the victims of the offense in an amount determined by the Court.

c. In accord with Title 18, United States Code, Section 3013, defendant will be assessed \$100 on the count to which he has pled guilty, in addition to any other penalty or restitution imposed.

d. In accord with Title 18, United States Code, Section 3014, defendant will be assessed a \$5,000 special assessment on the count to which he has pled guilty, in addition to any other penalty or restitution imposed.

Sentencing Guidelines Calculations

8. Defendant understands that in determining a sentence, the Court is obligated to calculate the applicable Sentencing Guidelines range, and to consider that range, possible departures under the Sentencing Guidelines, and other sentencing factors under 18 U.S.C. § 3553(a), which include: (i) the nature and circumstances of the offense and the history and characteristics of the defendant; (ii) the need for the sentence imposed to reflect the seriousness of the offense, promote respect for the law, and provide just punishment for the offense, afford adequate deterrence to criminal conduct, protect the public from further crimes of the defendant, and provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner; (iii) the kinds of sentences available; (iv) the need to avoid unwarranted sentence disparities among defendants with similar records who have been found guilty of similar conduct; and (v) the need to provide restitution to any victim of the offense.

9. For purposes of calculating the Sentencing Guidelines, the parties agree on the following points, except as specified below:

a. **Applicable Guidelines.** The Sentencing Guidelines to be considered in this case are those in effect at the time of sentencing. The following

statements regarding the calculation of the Sentencing Guidelines are based on the Guidelines Manual currently in effect, namely the November 2016 Guidelines Manual.

b. **Offense Level Calculations.**

i. Pursuant to Guideline § 2G1.3(d)(1), the Guidelines are calculated separately for each victim, as though each victim had been charged in a separate count of conviction.

Minor A

ii. Because the offense involved trafficking Minor A, who had attained the age of 14 years but had not attained the age of 18 years at the time of the offense, the base offense level is 30, pursuant to Guideline §§ 2G1.3(a)(2).

iii. Pursuant to Guideline § 2G1.3(b)(2)(B), a two-level enhancement applies because the defendant, who was more than forty years older than Minor A at the time of the offense, unduly influenced Minor A to engage in sexual conduct with the defendant.

iv. Pursuant to Guideline § 2G1.3(b)(3)(A), a two-level enhancement applies because the offense involved the use of a computer, namely a smart cellular phone, to persuade, induce, entice, coerce, or facilitate the travel of Minor A to engage in prohibited sexual conduct.

v. Pursuant to Guideline § 2G1.3(b)(4), a two-level enhancement applies because the offense involved the commission of a sex act.

Minor B

vi. Because the offense and relevant conduct involved trafficking Minor B, who had attained the age of 14 years but had not attained the age of 18 years at the time of the offense, the base offense level is 30, pursuant to Guideline §§ 2G1.3(a)(2).

vii. Pursuant to Guideline § 2G1.3(b)(2)(B), a two-level enhancement applies because the defendant, who was more than thirty-five years older than Minor B at the time of the offense, unduly influenced Minor B to engage in sexual conduct with the defendant.

viii. Pursuant to Guideline § 2G1.3(b)(3)(A), a two-level enhancement applies because the offense involved the use of a computer, namely a smart cellular phone, to persuade, induce, entice, coerce, or facilitate the travel of Minor B to engage in prohibited sexual conduct.

ix. Pursuant to Guideline § 2G1.3(b)(4), a two-level enhancement applies because the offense involved the commission of a sex act.

Minor C

x. Because the offense and relevant conduct involved trafficking Minor C, who had attained the age of 14 years but had not attained the age of 18 years at the time of the offense, the base offense level is 30, pursuant to Guideline §§ 2G1.3(a)(2).

xi. Pursuant to Guideline § 2G1.3(b)(2)(B), a two-level enhancement applies because the defendant, who was more than thirty-five years older than Minor C at the time of the offense, unduly influenced Minor C to engage in sexual conduct with the defendant.

xii. Pursuant to Guideline § 2G1.3(b)(3)(A), a two-level enhancement applies because the offense involved the use of a computer, namely a smart cellular phone, to persuade, induce, entice, coerce, or facilitate the travel of Minor C to engage in prohibited sexual conduct.

xiii. Pursuant to Guideline § 2G1.3(b)(4), a two-level enhancement applies because the offense involved the commission of a sex act.

Minor D

xiv. Because the offense and relevant conduct involved trafficking Minor D, who had attained the age of 14 years but had not attained the age of 18 years at the time of the offense, the base offense level is 30, pursuant to Guideline §§ 2G1.3(a)(2).

xv. Pursuant to Guideline § 2G1.3(b)(2)(B), a two-level enhancement applies because the defendant, who was more than thirty-five years older than Minor D at the time of the offense, unduly influenced Minor D to engage in sexual conduct with the defendant.

xvi. Pursuant to Guideline § 2G1.3(b)(3)(A), a two-level enhancement applies because the offense involved the use of a computer, namely a

smart cellular phone, to persuade, induce, entice, coerce, or facilitate the travel of Minor D to engage in prohibited sexual conduct.

xvii. Pursuant to Guideline § 2G1.3(b)(4), a two-level enhancement applies because the offense involved the commission of a sex act.

xviii. It is the government's position that, pursuant to Guideline § 3B1.3, a two-level enhancement applies because the defendant abused a position of public trust, namely, defendant's position as a police officer, in a manner that significantly facilitated the defendant's sex trafficking of Minor D. Defendant reserves the right to argue that this enhancement does not apply.

Combined Offense Level

xix. Pursuant to Guideline § 3D1.4(b), because there are four Units, four levels are added to the Group with the highest offense level, which is 38 pertaining to Minor D. The combined offense level is therefore 42.

xx. Defendant has clearly demonstrated a recognition and affirmative acceptance of personal responsibility for his criminal conduct. If the government does not receive additional evidence in conflict with this provision, and if defendant continues to accept responsibility for his actions within the meaning of Guideline § 3E1.1(a), including by furnishing the United States Attorney's Office and the Probation Office with all requested financial information relevant to his ability to satisfy any fine or restitution that may be imposed in this case, a two-level reduction in the offense level is appropriate.

xxi. In accord with Guideline § 3E1.1(b), defendant has timely notified the government of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the Court to allocate its resources efficiently. Therefore, as provided by Guideline § 3E1.1(b), if the Court determines the offense level to be 16 or greater prior to determining that defendant is entitled to a two-level reduction for acceptance of responsibility, the government will move for an additional one-level reduction in the offense level.

Pattern of Prohibited Sexual Conduct

xxii. Pursuant to Guideline § 4B1.5(b)(1), the government's position is that a five-level increase to the offense level applies because defendant's instant offenses of conviction are covered sex crimes, neither § 4B1.1 nor subsection (a) of § 4B1.5 applies, and defendant engaged in a pattern of activity involving prohibited sexual conduct. Defendant reserves the right to argue that this enhancement does not apply.

c. **Criminal History Category.** With regard to determining defendant's criminal history points and criminal history category, based on the facts now known to the government, defendant's criminal history points equal zero and defendant's criminal history category is I.

d. **Anticipated Advisory Sentencing Guidelines Range.** Therefore, based on the facts now known to the government, the government's position is that the anticipated offense level is 44, which, when combined with the

anticipated criminal history category of I, results in an anticipated advisory sentencing guidelines range of life imprisonment, in addition to any supervised release, fine, and restitution the Court may impose. Defendant also acknowledges that he is subject to a statutory minimum sentence of 10 years' imprisonment.

e. Defendant and his attorney and the government acknowledge that the above guidelines calculations are preliminary in nature, and are non-binding predictions upon which neither party is entitled to rely. Defendant understands that further review of the facts or applicable legal principles may lead the government to conclude that different or additional guidelines provisions apply in this case. Defendant understands that the Probation Office will conduct its own investigation and that the Court ultimately determines the facts and law relevant to sentencing, and that the Court's determinations govern the final guideline calculation. Accordingly, the validity of this Agreement is not contingent upon the probation officer's or the Court's concurrence with the above calculations, and defendant shall not have a right to withdraw his plea on the basis of the Court's rejection of these calculations.

10. Both parties expressly acknowledge that this Agreement is not governed by Fed. R. Crim. P. 11(c)(1)(B), and that errors in applying or interpreting any of the sentencing guidelines may be corrected by either party prior to sentencing. The parties may correct these errors either by stipulation or by a statement to the Probation Office or the Court, setting forth the disagreement regarding the applicable

provisions of the guidelines. The validity of this Agreement will not be affected by such corrections, and defendant shall not have a right to withdraw his plea, nor the government the right to vacate this Agreement, on the basis of such corrections.

Agreements Relating to Sentencing

11. Each party is free to recommend whatever sentence it deems appropriate.

12. It is understood by the parties that the sentencing judge is neither a party to nor bound by this Agreement and may impose a sentence up to the maximum penalties as set forth above. Defendant further acknowledges that if the Court does not accept the sentencing recommendation of the parties, defendant will have no right to withdraw his guilty plea.

13. Regarding restitution, defendant acknowledges that pursuant to Title 18, United States Code, Section 3663A, the Court must order defendant, together with any jointly liable co-defendants, to make full restitution to victims in an amount to be determined by the Court at sentencing, which amount shall reflect credit for any funds repaid prior to sentencing.

14. Restitution shall be due immediately, and paid pursuant to a schedule to be set by the Court at sentencing. Defendant acknowledges that pursuant to Title 18, United States Code, Section 3664(k), he is required to notify the Court and the United States Attorney's Office of any material change in economic circumstances that might affect his ability to pay restitution.

15. Defendant agrees to pay the special assessment of \$5,100 at the time of sentencing with a cashier's check or money order payable to the Clerk of the U.S. District Court.

16. Defendant agrees that the United States may enforce collection of any fine or restitution imposed in this case pursuant to Title 18, United States Code, Sections 3572, 3613, and 3664(m), notwithstanding any payment schedule set by the Court.

17. After sentence has been imposed on the count to which defendant pleads guilty as agreed herein, the government will move to dismiss the remaining counts of the superseding indictment, as well as the indictment.

Acknowledgments and Waivers Regarding Plea of Guilty

Nature of Agreement

18. This Agreement is entirely voluntary and represents the entire agreement between the United States Attorney and defendant regarding defendant's criminal liability in case 16 CR 719.

19. This Agreement concerns criminal liability only. Except as expressly set forth in this Agreement, nothing herein shall constitute a limitation, waiver, or release by the United States or any of its agencies of any administrative or judicial civil claim, demand, or cause of action it may have against defendant or any other person or entity. The obligations of this Agreement are limited to the United States Attorney's Office for the Northern District of Illinois and cannot bind any other

federal, state, or local prosecuting, administrative, or regulatory authorities, except as expressly set forth in this Agreement.

Waiver of Rights

20. Defendant understands that by pleading guilty he surrenders certain rights, including the following:

a. **Trial rights.** Defendant has the right to persist in a plea of not guilty to the charges against him, and if he does, he would have the right to a public and speedy trial.

i. The trial could be either a jury trial or a trial by the judge sitting without a jury. However, in order that the trial be conducted by the judge sitting without a jury, defendant, the government, and the judge all must agree that the trial be conducted by the judge without a jury.

ii. If the trial is a jury trial, the jury would be composed of twelve citizens from the district, selected at random. Defendant and his attorney would participate in choosing the jury by requesting that the Court remove prospective jurors for cause where actual bias or other disqualification is shown, or by removing prospective jurors without cause by exercising peremptory challenges.

iii. If the trial is a jury trial, the jury would be instructed that defendant is presumed innocent, that the government has the burden of proving defendant guilty beyond a reasonable doubt, and that the jury could not convict him unless, after hearing all the evidence, it was persuaded of his guilt beyond a

reasonable doubt and that it was to consider each count of the superseding indictment separately. The jury would have to agree unanimously as to each count before it could return a verdict of guilty or not guilty as to that count.

iv. If the trial is held by the judge without a jury, the judge would find the facts and determine, after hearing all the evidence, and considering each count separately, whether or not the judge was persuaded that the government had established defendant's guilt beyond a reasonable doubt.

v. At a trial, whether by a jury or a judge, the government would be required to present its witnesses and other evidence against defendant. Defendant would be able to confront those government witnesses and his attorney would be able to cross-examine them.

vi. At a trial, defendant could present witnesses and other evidence in his own behalf. If the witnesses for defendant would not appear voluntarily, he could require their attendance through the subpoena power of the Court. A defendant is not required to present any evidence.

vii. At a trial, defendant would have a privilege against self-incrimination so that he could decline to testify, and no inference of guilt could be drawn from his refusal to testify. If defendant desired to do so, he could testify in his own behalf.

b. **Waiver of appellate and collateral rights.** Defendant further understands he is waiving all appellate issues that might have been available if he

had exercised his right to trial. Defendant is aware that Title 28, United States Code, Section 1291, and Title 18, United States Code, Section 3742, afford a defendant the right to appeal his conviction and the sentence imposed. Acknowledging this, defendant knowingly waives the right to appeal his conviction, any pre-trial rulings by the Court, and any part of the sentence (or the manner in which that sentence was determined), including any term of imprisonment and fine within the maximums provided by law, and including any order of restitution, in exchange for the concessions made by the United States in this Agreement. In addition, defendant also waives his right to challenge his conviction and sentence, and the manner in which the sentence was determined, in any collateral attack or future challenge, including but not limited to a motion brought under Title 28, United States Code, Section 2255. The waiver in this paragraph does not apply to a claim of involuntariness or ineffective assistance of counsel, nor does it prohibit defendant from seeking a reduction of sentence based directly on a change in the law that is applicable to defendant and that, prior to the filing of defendant's request for relief, has been expressly made retroactive by an Act of Congress, the Supreme Court, or the United States Sentencing Commission.

21. Defendant understands that by pleading guilty he is waiving all the rights set forth in the prior paragraphs. Defendant's attorney has explained those rights to him, and the consequences of his waiver of those rights.

Presentence Investigation Report/Post-Sentence Supervision

22. Defendant understands that the United States Attorney's Office in its submission to the Probation Office as part of the Pre-Sentence Report and at sentencing shall fully apprise the District Court and the Probation Office of the nature, scope, and extent of defendant's conduct regarding the charges against him, and related matters. The government will make known all matters in aggravation and mitigation relevant to sentencing.

23. Defendant agrees to truthfully and completely execute a Financial Statement (with supporting documentation) prior to sentencing, to be provided to and shared among the Court, the Probation Office, and the United States Attorney's Office regarding all details of his financial circumstances, including his recent income tax returns as specified by the probation officer. Defendant understands that providing false or incomplete information, or refusing to provide this information, may be used as a basis for denial of a reduction for acceptance of responsibility pursuant to Guideline § 3E1.1 and enhancement of his sentence for obstruction of justice under Guideline § 3C1.1, and may be prosecuted as a violation of Title 18, United States Code, Section 1001 or as a contempt of the Court.

24. For the purpose of monitoring defendant's compliance with his obligations to pay a fine and restitution during any term of supervised release to which defendant is sentenced, defendant further consents to the disclosure by the IRS to the Probation Office and the United States Attorney's Office of defendant's

individual income tax returns (together with extensions, correspondence, and other tax information) filed subsequent to defendant's sentencing, to and including the final year of any period of supervised release to which defendant is sentenced. Defendant also agrees that a certified copy of this Agreement shall be sufficient evidence of defendant's request to the IRS to disclose the returns and return information, as provided for in Title 26, United States Code, Section 6103(b).

25. Defendant understands that pursuant to Title 18, United States Code, Sections 3583(d) and 4042(c), the Court must order as an explicit condition of supervised release that defendant register as a sex offender in compliance with the requirements of the Sex Offender Registration and Notification Act. Defendant also understands that he will be subject to federal and state sex offender registration requirements independent of supervised release, that those requirements may apply throughout his life, and that he may be subject to state and federal prosecution for failing to comply with applicable sex offender registration laws. Defendant understands that no one, including his attorney or the Court, can predict to a certainty the effect of his conviction on his duties to comply with current or future sex offender registration laws. Defendant nevertheless affirms that he wants to plead guilty regardless of any sex offender registration consequences that his guilty plea may entail.

26. Defendant agrees to participate in psychological counseling and sex offender treatment as directed by the Probation Office as a condition of any sentence of probation or supervised release imposed.

Other Terms

27. Defendant agrees to cooperate with the United States Attorney's Office in collecting any unpaid fine and restitution for which defendant is liable, including providing financial statements and supporting records as requested by the United States Attorney's Office.

28. Defendant will not object to a motion brought by the United States Attorney's Office for the entry of an order authorizing disclosure of documents, testimony and related investigative materials which may constitute grand jury material, preliminary to or in connection with any judicial proceeding, pursuant to Fed. R. Crim. P. 6(e)(3)(E)(i). In addition, defendant will not object to the government's solicitation of consent from third parties who provided records or other materials to the grand jury pursuant to grand jury subpoenas, to turn those materials over to the Civil Division of the United States Attorney's Office, or an appropriate federal or state agency (including but not limited to the Internal Revenue Service), for use in civil or administrative proceedings or investigations, rather than returning them to the third parties for later summons or subpoena in connection with a civil or administrative proceeding involving, or investigation of, defendant. Nothing in this

paragraph or the preceding paragraph precludes defendant from asserting any legal or factual defense to taxes, interest, and penalties that may be assessed by the IRS.

29. Defendant understands that, if convicted, a defendant who is not a United States citizen may be removed from the United States, denied citizenship, and denied admission to the United States in the future.

Conclusion

30. Defendant understands that this Agreement will be filed with the Court, will become a matter of public record, and may be disclosed to any person.

31. Defendant understands that his compliance with each part of this Agreement extends throughout the period of his sentence, and failure to abide by any term of the Agreement is a violation of the Agreement. Defendant further understands that in the event he violates this Agreement, the government, at its option, may move to vacate the Agreement, rendering it null and void, and thereafter prosecute defendant not subject to any of the limits set forth in this Agreement, or may move to resentence defendant or require defendant's specific performance of this Agreement. Defendant understands and agrees that in the event that the Court permits defendant to withdraw from this Agreement, or defendant breaches any of its terms and the government elects to void the Agreement and prosecute defendant, any prosecutions that are not time-barred by the applicable statute of limitations on the date of the signing of this Agreement may be commenced against defendant in accordance with this paragraph, notwithstanding the expiration of the statute of

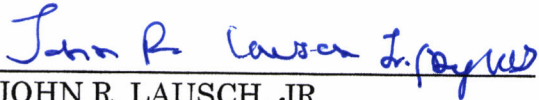
limitations between the signing of this Agreement and the commencement of such prosecutions.

32. Should the judge refuse to accept defendant's plea of guilty, this Agreement shall become null and void and neither party will be bound to it.


33. Defendant and his attorney acknowledge that no threats, promises, or representations have been made, nor agreements reached, other than those set forth in this Agreement, to cause defendant to plead guilty.

34. Defendant acknowledges that he has read this Agreement and carefully reviewed each provision with his attorney. Defendant further acknowledges that he understands and voluntarily accepts each and every term and condition of this Agreement.

AGREED THIS DATE: May 15, 2018




JOHN R. LAUSCH, JR.
United States Attorney



SARAH STREICKER
Assistant U.S. Attorney



WILLIAM WHITLEY
Defendant



STANDISH WILLIS
Attorney for Defendant