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CLERK, U.S. DISTRICT COURT  
4/1/26  
CENTRAL DISTRICT OF CALIFORNIA  
BY: \_\_\_\_\_ DEPUTY

FILED  
CLERK, U.S. DISTRICT COURT  
4/1/26  
CENTRAL DISTRICT OF CALIFORNIA  
BY: \_\_\_\_\_ MRV \_\_\_\_\_ DEPUTY

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9 Attorneys for Plaintiff  
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 EILEEN WANG,

17 Defendant.

No. CR 2:26-cr-00186-WLH

PLEA AGREEMENT FOR DEFENDANT  
EILEEN WANG

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

25 DEFENDANT'S OBLIGATIONS

26 2. Defendant agrees to:  
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1           a.     Give up the right to indictment by a grand jury and,  
2 at the earliest opportunity requested by the USAO and provided by the  
3 Court, appear and plead guilty to a single-count information in the  
4 form attached to this agreement as **Exhibit A** or a substantially  
5 similar form, which charges defendant with Acting in the United  
6 States as an Illegal Agent of a Foreign Government, in violation of  
7 18 U.S.C. § 951.

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

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

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

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

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

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

23           h.     Defendant understands that the government obtained  
24 additional material in this investigation that defendant has not been  
25 shown. In exchange for the government's obligations under this  
26 agreement, defendant gives up any right she may have had to review  
27 the additional material, regardless of whether it is arguably  
28 exculpatory or inculpatory, and further agrees to waive any argument

1 that the withholding of this material caused defendant's plea to be  
2 not knowing or involuntary. The government agrees not to use at  
3 sentencing any of the withheld material without providing it to  
4 defendant.

5 THE USAO'S OBLIGATIONS

6 3. The USAO agrees to:

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

8 b. Abide by all agreements regarding sentencing contained  
9 in this agreement.

10 c. At the time of sentencing, provided that defendant  
11 demonstrates an acceptance of responsibility for the offense up to  
12 and including the time of sentencing, recommend a two-level reduction  
13 in the applicable Sentencing Guidelines offense level, pursuant to  
14 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an  
15 additional one-level reduction if available under that section.

16 d. Except for criminal tax violations (including  
17 conspiracy to commit such violations chargeable under 18 U.S.C.  
18 § 371), not further criminally prosecute defendant for violations of  
19 18 U.S.C. § 371 (Conspiring to Act in the United States as an Illegal  
20 Agent of a Foreign Government), and 18 U.S.C. § 1001 (Making False  
21 Statements to a Government Agency), arising out of defendant's  
22 conduct described in the agreed-to factual basis set forth in  
23 paragraph 9 below. Defendant understands that the USAO is free to  
24 criminally prosecute defendant for any other unlawful past conduct or  
25 any unlawful conduct that occurs after the date of this agreement.

26 Defendant agrees that at the time of sentencing the Court may  
27 consider the uncharged conduct in determining the applicable  
28 Sentencing Guidelines range, the propriety and extent of any

1 departure from that range, and the sentence to be imposed after  
2 consideration of the Sentencing Guidelines and all other relevant  
3 factors under 18 U.S.C. § 3553(a).

4 NATURE OF THE OFFENSE

5 4. Defendant understands that for defendant to be guilty of  
6 the crime charged in count one, that is, Acting in the United States  
7 as an Illegal Agent of a Foreign Government, in violation of Title  
8 18, United States Code, Section 951, the following must be true:

9 (1) defendant acted in the United States as an agent of a foreign  
10 government or official, in this case, the government of the People's  
11 Republic of China; (2) defendant did not provide prior notification  
12 to the United States Attorney General; and (3) defendant acted  
13 knowingly. The term "agent of a foreign government" is defined as a  
14 person who agrees to act in the United States subject to the  
15 direction and control of a foreign government or official.

16 PENALTIES

17 5. Defendant understands that the statutory maximum sentence  
18 that the Court can impose for a violation of Title 18, United States  
19 Code, Section 951, is: 10 years imprisonment; a 3-year period of  
20 supervised release; a fine of \$250,000 or twice the gross gain or  
21 gross loss resulting from the offense, whichever is greatest; and a  
22 mandatory special assessment of \$100.

23 6. 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 of the term of supervised release authorized by statute for the

1 offense that resulted in the term of supervised release, which could  
2 result in defendant serving a total term of imprisonment greater than  
3 the statutory maximum stated above.

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

17 8. Defendant understands that, if defendant is not a United  
18 States citizen, the felony conviction in this case may subject  
19 defendant to: removal, also known as deportation, which may, under  
20 some circumstances, be mandatory; denial of citizenship; and denial  
21 of admission to the United States in the future. The Court cannot,  
22 and defendant's attorney also may not be able to, advise defendant  
23 fully regarding the immigration consequences of the felony conviction  
24 in this case. Defendant understands that unexpected immigration  
25 consequences will not serve as grounds to withdraw defendant's guilty  
26 plea.

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1 FACTUAL BASIS

2 9. Defendant admits that defendant is, in fact, guilty of the  
3 offense to which defendant is agreeing to plead guilty. Defendant  
4 and the USAO agree to the statement of facts provided below and agree  
5 that this statement of facts is sufficient to support a plea of  
6 guilty to the charge described in this agreement and to establish the  
7 Sentencing Guidelines factors set forth in paragraph 11 below but is  
8 not meant to be a complete recitation of all facts relevant to the  
9 underlying criminal conduct or all facts known to either party that  
10 relate to that conduct.

11 Beginning in at least late 2020, and continuing through at least  
12 2022, in Los Angeles County, within the Central District of  
13 California, defendant knowingly acted in the United States as an  
14 agent of a foreign government, namely, the People's Republic of China  
15 ("PRC"), and officials of that government, without prior notification  
16 to the Attorney General of the United States, as required by law.

17 Specifically, at the direction and control of PRC government  
18 officials, defendant coordinated with U.S.-based individuals to  
19 promote the interests of the PRC by, among other things, promoting  
20 pro-PRC propaganda in the United States.

21 In support of these efforts, from late 2020 through 2022,  
22 defendant and Yaoning "Mike" Sun ("SUN") worked together to operate a  
23 website, called U.S. News Center, that purported to be a news source  
24 for the local Chinese-American community. Defendant and SUN received  
25 and executed directives from PRC government officials to post pro-PRC  
26 content on the website, and sometimes sought approval from PRC  
27 government officials to circulate other pro-PRC content.

28 For example, on June 10, 2021, a PRC Official sent defendant and

1 several others, via an encrypted messaging application (i.e.,  
2 WeChat), in a group chat, a link to an article with the following  
3 message: "[PRC Consul General] Published an Essay on the LA Times  
4 Explaining China's Stance on the Xinjiang Issue -- There is no  
5 genocide in Xinjiang; there is no such thing as 'forced labor' in any  
6 production activity, including cotton production. Spreading such  
7 rumor is to defame China, destroy Xinjiang's safety and stability,  
8 weaken local economy, suppress China's development[.]"

9 Minutes later, on June 10, 2021, defendant WANG posted the  
10 article on her own website, and responded to the PRC Official with a  
11 link to the article on her website titled: "CG [Redacted] Published  
12 an Essay on the LA Times Explaining China's Stance on the Xinjiang  
13 Issue." The others in the group chat did the same. The PRC Official  
14 responded: "So fast, thank you everyone."

15 On August 20, 2021, defendant and three other members of the  
16 same group chat shared links to the same article on their respective  
17 "news" websites, after which the PRC Official thanked them for their  
18 "reporting." Separately, in a direct message to defendant, the PRC  
19 Official asked defendant to edit the article and delete any mention  
20 of a particular private company. Defendant responded, "Received,"  
21 then sent the PRC Official a link to the revised article on her  
22 website reflecting his requested change. Defendant then sent the PRC  
23 Official a screenshot showing that the article had been viewed  
24 15,128 times, to which he responded, "👍👍 Great!" Defendant then  
25 responded: "Thank you leader 🙏🙏😊."

26 Two days later, on August 22, 2021, the PRC Official sent the  
27 defendant a screenshot of the news article from August 20, 2021, to  
28 which defendant responded, "Need to be corrected?" The PRC Official

1 asked defendant to delete a particular photograph from the article.  
2 Defendant responded, "Okay, I'll take it off," then sent the PRC  
3 Official a link to the revised article, saying, "Removed." The PRC  
4 Official responded, "👍👍👍👍."

5 On November 27, 2021, defendant sent John Chen, via an encrypted  
6 messaging application (i.e., WeChat), a link to an article on her  
7 website titled "Chinese and Russian Ambassador to the U.S. jointly  
8 signed an article. Respect the People's Democratic Rights. Published  
9 in the National Interest," then wrote, "Big bro, I sent too many  
10 tonight, can't send anymore temporarily, is it possible to send it to  
11 your groups." After Chen expressed hesitation at distributing the  
12 requested article, defendant wrote, "This is what the Ministry of  
13 Foreign Affairs wants to send."

14 Each time defendant posted to her website at the PRC Official's  
15 direction, defendant was located in the United States. Defendant  
16 never disclosed on the website that some of its content had been  
17 posted at the direction of members of the PRC government. Defendant  
18 did not notify the Attorney General that she was acting in the United  
19 States as an agent of the PRC before, during, or after engaging in  
20 this conduct.

21 In 2022, defendant ran for Arcadia City Council, a five-person  
22 governing body from which the Mayor is selected on a rotating basis.  
23 Defendant was elected to the Arcadia City Council on November 8,  
24 2022.

#### 25 SENTENCING FACTORS

26 10. Defendant understands that in determining defendant's  
27 sentence the Court is required to calculate the applicable Sentencing  
28 Guidelines range and to consider that range, possible departures

1 under the Sentencing Guidelines, and the other sentencing factors set  
2 forth in 18 U.S.C. § 3553(a). Defendant understands that the  
3 Sentencing Guidelines are advisory only, that defendant cannot have  
4 any expectation of receiving a sentence within the calculated  
5 Sentencing Guidelines range, and that after considering the  
6 Sentencing Guidelines and the other § 3553(a) factors, the Court will  
7 be free to exercise its discretion to impose any sentence it finds  
8 appropriate up to the maximum set by statute for the crime of  
9 conviction.

10 11. The parties agree that the U.S.S.G. do not specify a  
11 Guidelines range for a violation of 18 U.S.C. § 951 and that there is  
12 no sufficiently analogous offense Guideline under U.S.S.G. § 2X5.1,  
13 and thus the provisions of 18 U.S.C. § 3553 should control. Except  
14 this agreement and except as set forth in paragraph 3 above,  
15 defendant and the USAO have no agreement as to the appropriate  
16 sentence or the applicable Sentencing Guidelines factors. Except as  
17 set forth in paragraph 3 above, both parties reserve the right to  
18 seek any sentence within the statutory maximum, and to argue for any  
19 criminal history score and category, base offense level, specific  
20 offense characteristics, adjustments, departures, and variances.

21 12. Defendant understands that in determining defendant's  
22 sentence the Court is required to calculate the applicable Sentencing  
23 Guidelines range and to consider that range, possible departures  
24 under the Sentencing Guidelines, and the other sentencing factors set  
25 forth in 18 U.S.C. § 3553(a). Defendant understands that the  
26 Sentencing Guidelines are advisory only, that defendant cannot have  
27 any expectation of receiving a sentence within the calculated  
28 Sentencing Guidelines range, and that after considering the

1 Sentencing Guidelines and the other § 3553(a) factors, the Court will  
2 be free to exercise its discretion to impose any sentence it finds  
3 appropriate up to the maximum set by statute for the crime of  
4 conviction.

5  
6 13. Defendant understands that there is no agreement as to  
7 defendant's criminal history or criminal history category.

8 14. Defendant and the USAO reserve the right to argue that  
9 additional specific offense characteristics, adjustments, and  
10 departures under the Sentencing Guidelines are appropriate.

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

15 WAIVER OF CONSTITUTIONAL RIGHTS

16 16. Defendant understands that by pleading guilty, defendant  
17 gives up the following rights:

- 18 a. The right to persist in a plea of not guilty.  
19 b. The right to a speedy and public trial by jury.  
20 c. The right to be represented by counsel -- and if  
21 necessary have the Court appoint counsel -- at trial. Defendant  
22 understands, however, that, defendant retains the right to be  
23 represented by counsel -- and if necessary have the Court appoint  
24 counsel -- at every other stage of the proceeding.  
25 d. The right to be presumed innocent and to have the  
26 burden of proof placed on the government to prove defendant guilty  
27 beyond a reasonable doubt.  
28

1 e. The right to confront and cross-examine witnesses  
2 against defendant.

3 f. The right to testify and to present evidence in  
4 opposition to the charges, including the right to compel the  
5 attendance of witnesses to testify.

6 g. The right not to be compelled to testify, and, if  
7 defendant chose not to testify or present evidence, to have that  
8 choice not be used against defendant.

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

12 i. The right to seek discovery, and to pursue any pending  
13 requests for discovery.

14 WAIVER OF APPEAL OF CONVICTION

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

24 LIMITED MUTUAL WAIVER OF APPEAL OF SENTENCE

25 18. Defendant agrees that, provided the Court imposes a total  
26 term of imprisonment on all counts of conviction of no more than 48  
27 months, defendant gives up the right to appeal all of the following:  
28 (a) the procedures and calculations used to determine and impose any

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

12 19. The USAO agrees that, provided (a) all portions of the  
13 sentence are at or below the statutory maximum specified above and  
14 (b) the Court imposes a term of imprisonment of no less than 12  
15 months, the USAO gives up its right to appeal any portion of the  
16 sentence.

17 WAIVER OF COLLATERAL ATTACK

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

1           WAIVER OF RIGHTS CONCERNING PLEA COLLOQUY AND FACTUAL BASIS

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

12           Defendant further agrees that this paragraph of the agreement is  
13 severable. Thus, defendant's waivers are binding and effective even  
14 if, subsequent to defendant's signing this agreement, defendant  
15 declines to plead guilty, the Court declines to accept his guilty  
16 plea, or, if this agreement is of the type described in Federal Rule  
17 of Criminal Procedure 11(c)(1)(A) or (c)(1)(C), the Court rejects  
18 this agreement. Defendant also agrees that his waivers are binding  
19 and effective even if some other portion of this agreement is found  
20 to be invalid by this Court or the Ninth Circuit.

21           RESULT OF WITHDRAWAL OF GUILTY PLEA

22           22. Defendant agrees that if, after entering a guilty plea  
23 pursuant to this agreement, defendant seeks to withdraw and succeeds  
24 in withdrawing defendant's guilty plea on any basis other than a  
25 claim and finding that entry into this plea agreement was  
26 involuntary, then (a) the USAO will be relieved of all of its  
27 obligations under this agreement; and (b) should the USAO choose to  
28 pursue any charge that was either dismissed or not filed as a result

1 of this agreement, then (i) any applicable statute of limitations  
2 will be tolled between the date of defendant's signing of this  
3 agreement and the filing commencing any such action; and  
4 (ii) defendant waives and gives up all defenses based on the statute  
5 of limitations, any claim of pre-indictment delay, or any speedy  
6 trial claim with respect to any such action, except to the extent  
7 that such defenses existed as of the date of defendant's signing this  
8 agreement.

9 EFFECTIVE DATE OF AGREEMENT

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

13 BREACH OF AGREEMENT

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

28

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

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

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

13                   COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

14                                   OFFICE NOT PARTIES

15           26. Defendant understands that the Court and the United States  
16 Probation and Pretrial Services Office are not parties to this  
17 agreement and need not accept any of the USAO's sentencing  
18 recommendations or the parties' agreements to facts or sentencing  
19 factors.

20           27. Defendant understands that both defendant and the USAO are  
21 free to: (a) supplement the facts by supplying relevant information  
22 to the United States Probation and Pretrial Services Office and the  
23 Court, (b) correct any and all factual misstatements relating to the  
24 Court's Sentencing Guidelines calculations and determination of  
25 sentence, and (c) argue on appeal and collateral review that the  
26 Court's Sentencing Guidelines calculations and the sentence it  
27 chooses to impose are not error, although each party agrees to  
28 maintain its view that the calculations in paragraph 11 are

1 consistent with the facts of this case. While this paragraph permits  
2 both the USAO and defendant to submit full and complete factual  
3 information to the United States Probation and Pretrial Services  
4 Office and the Court, even if that factual information may be viewed  
5 as inconsistent with the facts agreed to in this agreement, this  
6 paragraph does not affect defendant's and the USAO's obligations not  
7 to contest the facts agreed to in this agreement.

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

18 NO ADDITIONAL AGREEMENTS

19 29. Defendant understands that, except as set forth herein,  
20 there are no promises, understandings, or agreements between the USAO  
21 and defendant or defendant's attorney, and that no additional  
22 promise, understanding, or agreement may be entered into unless in a  
23 writing signed by all parties or on the record in court.

24 \\

1 PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

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

5 AGREED AND ACCEPTED

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

9 TODD BLANCHE  
10 Deputy Attorney General  
11 BILAL A. ESSAYLI  
12 First Assistant United States  
13 Attorney

14 *Amanda Elbogen*  
15 AMANDA B. ELBOGEN  
16 Assistant United States Attorney

3/31/2026

Date

17 *Eileen Wang*  
18 EILEEN WANG  
19 Defendant

*3/30/2026*  
Date

20 *Brian Sun*  
21 BRIAN SUN  
22 Attorney for Defendant EILEEN WANG

*3/30/26*  
Date

CERTIFICATION OF DEFENDANT

This agreement has been read to me in Mandarin Chinese, 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.



EILEEN WANG  
Defendant

3/30/2016

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Date

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CERTIFICATION OF INTERPRETER

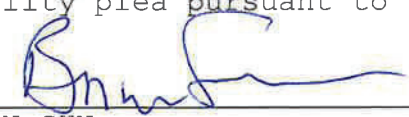
I, \_\_\_\_\_, am fluent in the written and spoken English and Mandarin Chinese languages. I accurately translated this entire agreement from English into Mandarin Chinese to defendant EILEEN WANG on this date.

  
\_\_\_\_\_  
INTERPRETER

3/30/2016  
\_\_\_\_\_  
Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am EILEEN WANG'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.

  
\_\_\_\_\_  
BRIAN SUN  
Attorney for Defendant EILEEN WANG

3/30/26  
\_\_\_\_\_  
Date