

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

AARON FLORES

No. 19 CR 771-2

Judge Ronald A. Guzman

PLEA AGREEMENT

1. This Plea Agreement between the United States Attorney for the Northern District of Illinois, JOHN R. LAUSCH, JR., and defendant AARON FLORES, and his attorney, JAMES TUNICK, is made pursuant to Rule 11 of the Federal Rules of Criminal Procedure. The parties to this Agreement have agreed upon the following:

Charges in This Case

2. The superseding information in this case charges defendant with bank robbery, in violation of Title 18, United States Code, Section 2113(a) (Counts 1-3).

3. Defendant has read the charges against him contained in the superseding information, 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 counts of the superseding information: Counts 1, 2, and 3,

which charge defendant with bank robbery, in violation of Title 18, United States Code, Section 2113(a).

Factual Basis

6. Defendant will plead guilty because he is in fact guilty of the charges contained in Counts 1, 2, and 3 of the superseding information. In pleading guilty, defendant admits the following facts and that those facts establish his guilt beyond a reasonable doubt:

a. With respect to Count 1 of the superseding information:

On or about September 17, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, defendant AARON FLORES, by intimidation, took from the person and presence of a bank employee approximately \$500 in United States currency belonging to and in the care, custody, control, management, and possession of the Citibank located at 3535 North Central Avenue, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

More specifically, on or about September 17, 2019, on instructions from Manuel Martinez, a/k/a “Talivan” or “Tali,” defendant drove Andres Adame in a stolen car to the Citibank located at 3535 North Central Avenue, Chicago, Illinois. Defendant and Adame then entered the bank to rob it. Defendant wore, among other things, a hat, sunglasses, a medical mask, and a black hooded sweatshirt with the hood up. Adame wore, among other things, a multi-colored hat, sunglasses, medical mask, and a fake

dark beard. In the bank, defendant approached and then put his arms around a teller and demanded money. Defendant and Adame took approximately \$500 from the bank tellers and left in their stolen car. Defendant, Adame, and Martinez then met, and defendant and Adame gave the proceeds from the robbery to Martinez. Defendant acknowledges that at the time of the robbery, the Citibank's deposits were insured by the Federal Deposit Insurance Corporation.

b. With respect to Count 2 of the superseding information:

On or about September 18, 2019, at Park Ridge, in the Northern District of Illinois, Eastern Division, defendant, by intimidation, took from the person and presence of a bank employee approximately \$1,541 in United States currency belonging to, and in the care, custody, control, management, and possession of the TCF Bank located at 1 West Devon Avenue, Park Ridge, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

More specifically, on or about September 18, 2019, Martinez drove defendant and Adame in a stolen car to the TCF Bank located at 1 West Devon Avenue, Park Ridge, Illinois. Martinez waited outside while defendant and Adame entered the bank to rob it. Defendant wore, among other things, a hat, sunglasses, a medical mask, and a black hooded sweatshirt with the hood up. Adame wore, among other things, a multi-colored hat, sunglasses, medical mask, and a fake dark beard. In the bank, defendant approached the tellers and gave them a note demanding money and

threatening to “shoot” if the tellers alerted anyone. Defendant and Adame took approximately \$1,541 from the bank tellers, exited the bank, and left in the stolen car driven by Martinez. Defendant acknowledges that at the time of the robbery, the TCF Bank’s deposits were insured by the Federal Deposit Insurance Corporation.

c. With respect to Count 3 of the superseding information:

On or about October 2, 2019, at Elmwood Park, in the Northern District of Illinois, Eastern Division, defendant, by intimidation, took from the person and presence of a bank employee approximately \$2,382 in United States currency belonging to, and in the care, custody, control, management, and possession of the U.S. Bank located at 7312 West Grand Avenue, Elmwood Park, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

More specifically, on or about October 2, 2019, defendant drove Adame and Martinez in a stolen car to the U.S. Bank located at 7312 West Grand Avenue, Elmwood Park, Illinois, and waited outside while Adame and Martinez entered the bank, knowing that Adame and Martinez planned to rob the bank. Adame wore, among other things, a black hooded sweatshirt, dark gloves, a cap, sunglasses, and a medical mask. Martinez wore, among other things, a red hooded jacket with black panels on the sides, dark gloves, sunglasses, and a medical mask. Defendant acknowledges that in the bank, Adame and Martinez approached the tellers and demanded money, and that Adame and Martinez took approximately \$2,382 from the

bank tellers, exited the bank, and left in the stolen car driven by defendant. Defendant, Adame, and Martinez fled from pursuing law-enforcement vehicles, speeding, hitting at least two vehicles, and crashing in a residential yard before being taken into custody. Defendant acknowledges that at the time of the robbery, the U.S. Bank's deposits were insured by the Federal Deposit Insurance Corporation.

7. Defendant, for purposes of computing his sentence under Guideline § 1B1.2, stipulates to having committed the following additional offenses:

a. With respect to Stipulated Offense One:

On or about September 26, 2019, at Franklin Park, in the Northern District of Illinois, Eastern Division, defendant, by intimidation, took from the person and presence of a bank employee, approximately \$2,431 in United States currency belonging to, and in the care, custody, control, management, and possession of the PNC Bank located at 10272 West Grand Avenue, Franklin Park, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

More specifically, on or about September 26, 2019, defendant and Martinez drove in a car to rob the PNC Bank located at 10272 West Grand Avenue, Franklin Park, Illinois. Defendant wore, among other things, a black hooded jacket with the hood up, gloves, a mask, and a hat. Martinez wore, among other things, a red hooded jacket with darker panels on the sides and the hood up, gloves, and a mask. Defendant and Martinez entered the bank, and defendant jumped on the teller counter and

demanded money. Defendant and Martinez took approximately \$2,431 from the tellers. Adame, knowing that defendant and Martinez had robbed the bank, later drove defendant and Martinez back to Adame's house to count the money taken from the bank. Defendant further acknowledges that at the time of the robbery, the PNC Bank's deposits were insured by the Federal Deposit Insurance Corporation.

b. With respect to Stipulated Offense Two:

On or about September 27, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, defendant, by intimidation, took from the person and presence of a bank employee, approximately \$2,645 in United States currency belonging to, and in the care, custody, control, management, and possession of the Fifth Third Bank located at 5670 North Milwaukee Avenue, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

More specifically, on or about September 27, 2019, Adame drove defendant and Martinez to the Fifth Third Bank located at 5670 North Milwaukee Avenue, Chicago, Illinois, and waited outside in the car while defendant and Martinez entered the bank to rob it. Defendant wore, among other things, a black hooded jacket with the hood up, sunglasses, gloves, and a mask. Martinez wore, among other things, a hooded red jacket with the hood up, sunglasses, a mask, and gloves. Inside the bank, defendant approached the tellers, gave them a note demanding money and threatening to "shoot," and jumped up onto the teller counter. Defendant and Martinez took

approximately \$2,645 from the tellers, and Adame drove defendant and Martinez away from the bank after the robbery. Defendant also acknowledges that at the time of the robbery, the Fifth Third Bank's deposits were insured by the Federal Deposit Insurance Corporation.

Maximum Statutory Penalties

8. Defendant understands that the charges to which he is pleading guilty carry the following statutory penalties:

a. Count 1 carries a maximum sentence of 20 years' imprisonment. Count 1 also carries a maximum fine of \$250,000. Defendant further understands that with respect to Count 1 the judge also may impose a term of supervised release of not more than three years.

b. Count 2 carries a maximum sentence of 20 years' imprisonment. Count 2 also carries a maximum fine of \$250,000. Defendant further understands that with respect to Count 2, the judge also may impose a term of supervised release of not more than three years.

c. Count 3 carries a maximum sentence of 20 years' imprisonment. Count 3 also carries a maximum fine of \$250,000. Defendant further understands that with respect to Count 3 the judge also may impose a term of supervised release of not more than three years.

d. Defendant further understands that the Court must order restitution to the victims of the offense in an amount determined by the Court. The Court also may order restitution to any persons as agreed by the parties.

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

f. Therefore, under the counts to which defendant is pleading guilty, the total maximum sentence is 60 years' imprisonment. In addition, defendant is subject to a total maximum fine of \$750,000, a period of supervised release, and special assessments totaling \$300, in addition to any restitution ordered by the Court.

Sentencing Guidelines Calculations

9. 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.

10. For purposes of calculating the Sentencing Guidelines, the parties agree on the following points:

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 2018 Guidelines Manual.

b. **Offense Level Calculations.**

Count One

i. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

ii. Pursuant to Guideline § 2B3.1(b)(1), the offense level is increased by two levels because the property of a financial institution was taken.

Count Two

i. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

ii. Pursuant to Guideline § 2B3.1(b)(1), the offense level is increased by two levels because the property of a financial institution was taken.

iii. Pursuant to Guideline § 2B3.1(b)(2)(F), the offense level is increased by two levels because a threat of death was made.

Count Three

i. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

ii. Pursuant to Guideline § 2B3.1(b)(1), the offense level is increased by two levels because the property of a financial institution was taken.

iii. Pursuant to Guideline § 3C1.2, the offense level is increased by two levels because defendant recklessly created a substantial risk of death or serious bodily injury to another person in the course of fleeing from a law enforcement officer.

Stipulated Offense One

i. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

ii. Pursuant to Guideline § 2B3.1(b)(1), the offense level is increased by two levels because the property of a financial institution was taken.

Stipulated Offense Two

i. The base offense level is 20, pursuant to Guideline § 2B3.1(a).

ii. Pursuant to Guideline § 2B3.1(b)(1), the offense level is increased by two levels because the property of a financial institution was taken.

iii. Pursuant to Guideline § 2B3.1(b)(2)(F), the offense level is increased by two levels because a threat of death was made.

Grouping

i. Pursuant to Guideline § 3D1.2, Counts One, Two, and Three, and Stipulated Offenses One and Two are not grouped together and should be treated separately.

1. The group with the highest offense level is Count Two with an offense level of 24. That group is assigned one unit pursuant to Guideline § 3D1.4(a).

2. The group with the next highest offense level is Count Three with an offense level of 24. That group is assigned one unit pursuant to Guideline § 3D1.4(a) because it is equally serious to Count Two.

3. The group with the next highest offense level is Stipulated Offense Two with an offense level of 24. That group is assigned one unit pursuant to Guideline § 3D1.4(a) because it is equally serious to Count Two.

4. The group with the next highest offense level is Count One with an offense level of 22. That group is assigned one unit pursuant to Guideline § 3D1.4(a) because it is one to four levels less serious than Count Two.

5. The group with the next highest offense level is Stipulated Offense One with an offense level of 22. That group is assigned one unit

pursuant to Guideline § 3D1.4(a) because it is one to four levels less serious than Count Two.

ii. The total number of units is five. Pursuant to Guideline § 3D1.4, there is a four-level increase in the offense level, which, when added to the offense level applicable to the highest offense level, 24, results in a combined offense level of 28.

Acceptance of Responsibility

i. 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.

ii. 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.

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 and stipulated below, defendant's criminal history points equal 3 and defendant's criminal history category is II:

i. On or about December 13, 2018, defendant was convicted of driving under the influence of alcohol in the Nineteenth Judicial Circuit Court of Lake County, Illinois and sentenced to 12 months' supervision. Pursuant to Guideline § 4A1.1(c) and Application Note 5 to Guideline § 4A1.2, defendant receives one criminal history point for this sentence.

ii. Defendant committed the instant offenses while under a criminal justice, namely, the term of supervision arising from the conviction described above in paragraph 11(c)(i). Pursuant to Guideline § 4A1.1(d), two criminal history points are added.

d. **Anticipated Advisory Sentencing Guidelines Range.** Therefore, based on the facts now known to the government, the anticipated offense level is 25, which, when combined with the anticipated criminal history category of II, results in an anticipated advisory sentencing guidelines range of 63 to 78 months' imprisonment, in addition to any supervised release, fine, and restitution the Court may impose.

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.

11. 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

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

13. 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.

14. Regarding restitution, defendant acknowledges that the total amount of restitution owed to victims is \$2,041, minus any credit for funds repaid prior to sentencing, and 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 in the amount outstanding at the time of sentencing. Defendant also agrees to pay additional restitution, arising from the stipulated offense conduct set forth above at paragraphs 7(a)-(b), totaling \$5,076, pursuant to Title 18, United States Code, Sections 3663(a)(3) and 3664.

15. 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.

16. Defendant agrees to pay the special assessment of \$300 at the time of sentencing with a cashier's check or money order payable to the Clerk of the U.S. District Court.

17. 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.

18. After sentence has been imposed on the counts to which defendant pleads guilty as agreed herein, the government will move to dismiss the indictment and the forfeiture allegation as to defendant.

Acknowledgments and Waivers Regarding Plea of Guilty

Nature of Agreement

19. This Agreement is entirely voluntary and represents the entire agreement between the United States Attorney and defendant regarding defendant's criminal liability in case 19 CR 771-2.

20. 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

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

a. **Right to be charged by indictment.** Defendant understands that he has a right to have the charges prosecuted by an indictment returned by a concurrence of twelve or more members of a grand jury consisting of not less than sixteen and not more than twenty-three members. By signing this Agreement, defendant knowingly waives his right to be prosecuted by indictment and to assert at trial or on appeal any defects or errors arising from the information, the information process, or the fact that he has been prosecuted by way of information.

b. **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 information 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.

c. **Appellate rights.** Defendant further understands he is waiving all appellate issues that might have been available if he had exercised his right to trial, and may only appeal the validity of this plea of guilty and the sentence imposed. Defendant understands that any appeal must be filed within 14 calendar days of the entry of the judgment of conviction.

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

Presentence Investigation Report/Post-Sentence Supervision

23. 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.

24. 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.

25. For the purpose of monitoring defendant's compliance with his obligations to pay a fine and restitution during any term of supervised release or probation 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 or probation 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).

Other Terms

26. 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.

27. 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

28. 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.

29. 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.

30. 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.

31. 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.

32. 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: 08/25/2021

ERIKA CSICSILA Digitally signed by ERIKA CSICSILA
Date: 2021.08.25 09:51:50 -05'00'

signed by Erika L. Csicsila on behalf of
JOHN R. LAUSCH, JR.
United States Attorney

ASHLEY CHUNG Digitally signed by ASHLEY CHUNG
Date: 2021.08.25 09:50:35 -05'00'

ASHLEY A. CHUNG
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Aaron Flores

AARON FLORES
Defendant

James Tunick
JAMES TUNICK
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