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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 09 2025

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,
13
14 Plaintiff,

Case No.: 2:25-CR-113-RLP-4
Plea Agreement

15 v.

16 ERIN NICOLE LANG,
17
18 Defendant.

19 Plaintiff United States of America, by and through S. Peter Serrano, United
20 States Attorney the Eastern District of Washington, and Lisa C. Cartier Giroux and
21 Rebecca R. Perez, Assistant United States Attorneys for the Eastern District of
22 Washington, and Defendant Erin Nicole Lang (“Defendant”), both individually and
23 by and through Defendant’s counsel, Sandy D. Baggett, agree to the following Plea
24 Agreement.

25 1. Guilty Plea and Maximum Statutory Penalties

26 Defendant agrees to enter a plea of guilty to Count 1 of the Indictment filed
27 on July 9, 2025, which charges Defendant with *Conspiracy to Impede or Injure*
28 *Officers*, in violation of 18 U.S.C. § 372, a Class D felony.

Defendant understands that the following potential penalties apply:

- 1 a. a term of imprisonment of up to 6 years;
- 2 b. a term of supervised release of up to 3 years;
- 3 c. a fine of up to \$250,000;
- 4 d. restitution; and
- 5 e. a \$100 special penalty assessment.

6 2. Supervised Release

7 Defendant understands that if Defendant violates any condition of
8 Defendant's supervised release, the Court may revoke Defendant's term of
9 supervised release, and require Defendant to serve in prison all or part of the term
10 of supervised release authorized by statute for the offense that resulted in such term
11 of supervised release without credit for time previously served on postrelease
12 supervision, up to the following terms:

- 13 a. 5 years in prison if the offense that resulted in the term of
14 Supervised Release is a class A felony,
- 15 b. 3 years in prison if the offense that resulted in the term of
16 Supervised Release is a class B felony, and/or
- 17 c. 2 years in prison if the offense that resulted in the term of
18 Supervised Release is a class C or D felony.

19 Accordingly, Defendant understands that if Defendant commits one or more
20 violations of supervised release, Defendant could serve a total term of
21 incarceration greater than the maximum sentence authorized by statute for
22 Defendant's offense or offenses of conviction.

23 3. The Court is Not a Party to this Plea Agreement

24 The Court is not a party to this Plea Agreement and may accept or reject it.
25 Defendant acknowledges that no promises of any type have been made to
26 Defendant with respect to the sentence the Court will impose in this matter.

27 Defendant understands the following:

- 28 a. sentencing is a matter solely within the discretion of the Court;

- b. the Court is under no obligation to accept any recommendations made by the United States or Defendant;
- c. the Court will obtain an independent report and sentencing recommendation from the United States Probation Office;
- d. the Court may exercise its discretion to impose any sentence it deems appropriate, up to the statutory maximum penalties;
- e. the Court is required to consider the applicable range set forth in the United States Sentencing Guidelines, but may depart upward or downward under certain circumstances; and
- f. the Court may reject recommendations made by the United States or Defendant, and that will not be a basis for Defendant to withdraw from this Plea Agreement or Defendant's guilty plea.

4. Potential Immigration Consequences of Guilty Plea

If Defendant is not a citizen of the United States, Defendant understands the following:

- a. pleading guilty in this case may have immigration consequences;
- b. a broad range of federal crimes may result in Defendant's removal from the United States, including the offense to which Defendant is pleading guilty;
- c. removal from the United States and other immigration consequences are the subject of separate proceedings; and
- d. no one, including Defendant's attorney or the Court, can predict with absolute certainty the effect of a federal conviction on Defendant's immigration status.

1 Defendant affirms that Defendant is knowingly, intelligently, and voluntarily
2 pleading guilty as set forth in this Plea Agreement, regardless of any immigration
3 consequences that Defendant's guilty plea may entail.

4 5. Waiver of Constitutional Rights

5 Defendant understands that by entering this guilty plea, Defendant is
6 knowingly and voluntarily waiving certain constitutional rights, including the
7 following:

- 8 a. the right to a jury trial;
- 9 b. the right to see, hear and question the witnesses;
- 10 c. the right to remain silent at trial;
- 11 d. the right to testify at trial; and
- 12 e. the right to compel witnesses to testify.

13 While Defendant is waiving certain constitutional rights, Defendant
14 understands that Defendant retains the right to be assisted by an attorney through
15 the sentencing proceedings in this case and any direct appeal of Defendant's
16 conviction and sentence, and that an attorney will be appointed at no cost if
17 Defendant cannot afford to hire an attorney.

18 Defendant understands and agrees that any defense motions currently
19 pending before the Court are mooted by this Plea Agreement, and Defendant
20 expressly waives Defendant's right to bring any additional pretrial motions.

21 6. Admissibility of Facts and Prior Statements

22 By signing this Plea Agreement, Defendant admits the truth of the facts set
23 forth in the Factual Basis section of this Plea Agreement and agrees that these
24 facts, along with any written or oral statements Defendant makes in court, shall be
25 deemed usable and admissible against Defendant in any subsequent legal
26 proceeding, including criminal trials and/or sentencing hearings, under Federal
27 Rule of Evidence 801(d)(2)(A).

1 Defendant acknowledges, admits, and agrees that by signing this Plea
2 Agreement, Defendant is expressly modifying and waiving Defendant's rights
3 under Federal Rule of Criminal Procedure 11(f) and Federal Rule of Evidence 410
4 with regard to any facts Defendant admits and/or any statements Defendant makes
5 in court.

6 7. Elements of the Offense

7 The United States and Defendant agree that in order to convict Defendant of
8 Conspiracy to Impede or Injure Officers, in violation of 18 U.S.C. § 372, the
9 United States would have to prove the following beyond a reasonable doubt.

- 10 a. *First*, on or about June 11, 2025, in the Eastern District of
11 Washington, there was an agreement between two or more
12 persons to commit the crime of obstructing or impeding officers
13 of the United States;
- 14 b. *Second*, Defendant became a member of the conspiracy
15 knowing of its object and intending to help accomplish it; and
- 16 c. *Third*, the object of the conspiracy was to prevent by force,
17 intimidation, or threat an officer of the United States from
18 discharging their official duties, or to injure an officer of the
19 United States in his person or property on account of his lawful
20 discharge of his official duties or while engaged in the lawful
21 discharge therefore, or to injure the property of an officer of the
22 United States so as to molest, interrupt, hinder, or impede him
23 in the discharge of his official duties.

24 8. Factual Basis and Statement of Facts

25 The United States and Defendant stipulate and agree to the following: the
26 Defendant agrees that the United States could prove the facts set forth below
27 beyond a reasonable doubt at trial; and these facts constitute an adequate factual
28 basis for Defendant's guilty plea.

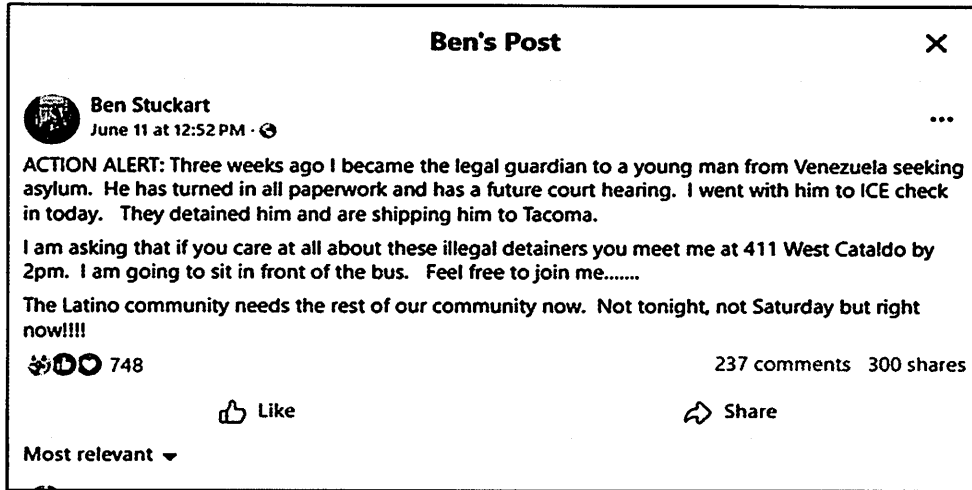
1 The United States and Defendant agree that this statement of facts does not
2 preclude either party from presenting and arguing, for sentencing purposes,
3 additional facts that are relevant to the Sentencing Guidelines computation or
4 sentencing.

5 On June 11, 2025, in the Eastern District of Washington, Co-Conspirator
6 Benjamin Stuckart (“STUCKART”) arrived at the Homeland Security
7 Investigations (HSI) Field Office located at 411 W Cataldo Ave, Spokane
8 Washington along with two adult males who had immigration appointments for
9 which they had received notification through their “myUSCIS” accounts.

10 The two adult males had been provided notice that their Employment
11 Authorization Documents had been cancelled on May 29, 2025. The notices stated:
12 “DHS records indicate that your parole has expired or been terminated. In response
13 to the Notice of Intent to Revoke Parole-Based Employment Authorization, you
14 did not submit any evidence showing that your parole was renewed or extended.”

15 Because their parole had not been renewed or extended, the two adult males
16 had active arrest warrants and were taken into custody by Immigration and
17 Customs Enforcement officers when they arrived at the HSI Field Office. Officers
18 advised STUCKART that the two adult males would be transported that same day
19 from Spokane to Tacoma, Washington for hearings before an immigration judge.

20 After the two adult males were taken into custody on the warrants,
21 STUCKART disseminated a communication on social media platform Facebook at
22 approximately 12:52 pm requesting that others come to the HSI Field Office to
23 help STUCKART stop federal officers from leaving the federal facility and
24 transporting the two adult males. A screenshot of STUCKART’s post is below:
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26
27
28



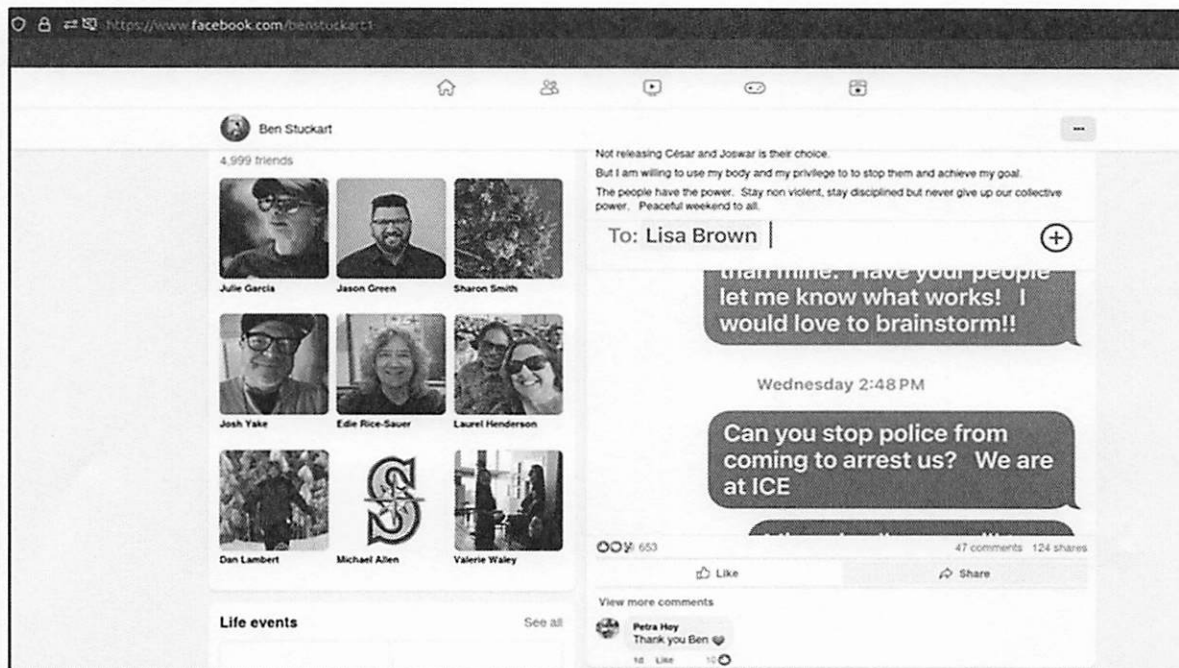
Following STUCKART’s Facebook post at 12:52 pm, Defendant and Co-Conspirators, including the charged Co-Defendants, began to arrive at the facility. Co-Conspirator Justice FORRAL (“FORRAL”) parked his red Toyota Yaris with Oregon plates in front of a white federal transport bus to physically block its path from leaving the facility. Defendant and FORRAL released the air from two of the tires of the white bus to flatten them to render the bus inoperable. Another unindicted Co-Conspirator placed white paint across the windshield of the bus to prevent a driver from being able to safely operate it. Co-Conspirators STUCKART and Jac Dalitso ARCHER (“ARCHER”), and other unindicted Co-Conspirators physically blocked the pathway and door to the white transport bus to prevent entry with the detainees, disregarding orders to disperse made by federal officers. While at the bus, using a megaphone, ARCHER directed the Co-Conspirators to come together to discuss further tactics to impede the officers, saying, “... [F]or folks who are willing to risk arrest, we might want to do a huddle, because we want to know how many of us there are, so we can keep track of each other, and just do a quick debrief to make sure that we are all prepared the way we need to be.”

Federal officers soon determined that the white transport bus could not be used to transport the detainees because the federal officers could not enter into the bus and Defendant and the Co-Conspirators had rendered it unsafe to drive.

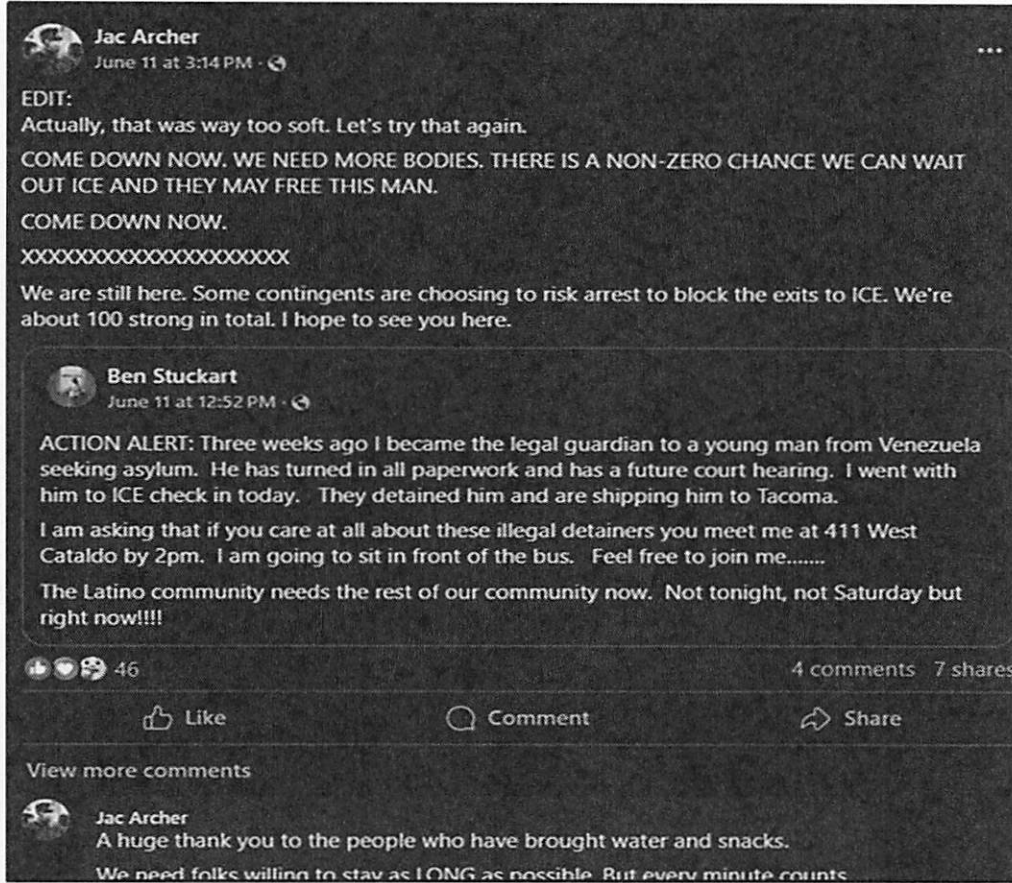
1 Because the HSI Field Office did not have the facilities to house detainees
2 long term, federal officers needed to devise a plan to transport the detainees to
3 Tacoma that same day. They developed a plan to exit with the detainees through
4 the secure parking lot and vehicle gate located on the south end of the premises.
5 Federal officers prepared to exit in a convoy of approximately three vehicles;
6 however, as soon as the gate was opened, Co-Conspirators ARCHER, Mikki Pike
7 HATFIELD (“HATFIELD”), Collin James MUNCEY (“MUNCEY”), Bobbi Lee
8 SILVA (“SILVA”), Bajun Dhunjisha MAVALWALLA, II (“MAVALWALLA”),
9 and other unindicted Co-Conspirators physically blocked the exit by standing in
10 front of the driveway at the gate and linking arms, thereby preventing the convoy
11 from leaving. ARCHER is captured on video again instructing the Co-
12 Conspirators, “If you’re risking arrest, this is what we talked about, linking arms.”
13 ARCHER then linked arms with Co-Conspirators to block the exit gate. Even after
14 being physically moved back by federal officers in an effort to allow the vehicles
15 to leave the facility, the Co-Conspirators returned to the driveway area to resume
16 blocking the federal vehicles from exiting. SILVA was captured on video striking
17 an HSI officer from behind as he was attempting to clear the pathway for the
18 transport vehicles to safely exit the facility. MAVALWALLA was also captured
19 on video just inside of the secured parking on HSI property shoving into one of the
20 federal officers with his body. Despite repeated lawful orders to give access for the
21 convoy to proceed and to remove themselves from the facility driveway, Co-
22 Conspirators did not move back but continued to scream at the federal officers and
23 physically block egress from the facility. Being outnumbered by the Co-
24 Conspirators and concerned over their safety because of the aggression of the
25 crowd, as well as the safety of the detainees, and not wanting to drive through the
26 crowd and cause physical harm to any civilians, the federal officers retreated back
27 inside the facility.

1 FORRAL, MUNCEY, HATFIELD, and other unindicted Co-Conspirators
2 also worked to block exits of the federal facility to trap federal officers and
3 detainees inside the facility by piling objects in front of exits and gates, including
4 signs, Lime scooters, sand/cement bags, trash cans, and benches.

5 At approximately 2:48 pm STUCKART began contacting the City of
6 Spokane Mayor Lisa Brown. STUCKART stated in a subsequent Facebook post on
7 June 13, 2025, that he had texted Mayor Brown requesting that police not be sent:



20 At approximately 3:14 pm on June 11, 2025, ARCHER shared on their
21 Facebook page STUCKART's "ACTION ALERT". ARCHER re-posted and
22 commented on the post calling for more people to come to the HSI Field Office to
23 prevent federal officers from transporting the detainees and to force federal officers
24 to release the detainees. A screenshot of ARCHER's post is below:



15 At approximately 6:00 pm, Border Patrol Agents (BPA) devised an alternate
16 plan to allow federal agents to safely transport the detainees to Tacoma for their
17 hearings. A red transport van was driven in a vehicle convoy to the southeast side
18 of the facility. Spokane Police Department (“SPD”) marked patrol vehicles parked
19 in front and behind the red transport van to prevent the Co-Conspirators from again
20 placing vehicles in the van’s exit path. This time, SPD tried to keep the Co-
21 Conspirators separated from the federal officers and the detainees. The federal
22 officers and the detainees, however, were not able to safely access the public space
23 to get to their transport van. Co-Conspirators placed objects, to include Lime
24 scooters, in front of the marked patrol vehicles to block the exit path of the red van.
25 The red van was also quickly surrounded by Defendant and STUCKART,
26 HATFIELD, SILVA, Thalia Marie RAMIREZ (“RAMIREZ”) and other
27 unindicted Co-Conspirators, who used their bodies to physically block access to
28 the van and its movement. Co-Conspirators also placed themselves between the

1 SPD vehicles to prevent the red van from being able to pull away without the
2 possibility of injury, in addition to surrounding the red van and linking arms
3 around the van. Co-Conspirators began to become increasingly aggressive in their
4 physical resistance to law enforcement despite law enforcement's repeated
5 warnings that force could be used if the crowd did not comply with commands. As
6 a result of the Co-Conspirators actions, the federal agents inside the van were
7 unable to exit the vehicle, and federal officers were also unable to enter the van
8 with the detainees. Further, Co-Conspirator RAMIREZ, armed with a boxcutter,
9 slashed the tires of the red van, rendering it unsafe to drive.

10 The Spokane County Sheriff's Office (SCSO) had indicated a willingness to
11 respond and intervene to disperse the Co-Conspirators when the first calls came
12 from the federal facility requesting aid after STUCKART's original Facebook
13 callout. At approximately 6:30 pm, SCSO deputies were ordered by the Sheriff to
14 respond to the scene to assist the federal officers, civilian employees, and detainees
15 still inside the facility. After approximately 30 minutes of dispersal orders and
16 notifications to the crowd, SPD command approved the use of smoke to control the
17 hundreds of individuals in the crowd who had by then joined the original Co-
18 Conspirators blocking the facility and the surrounding roadways. After the smoke
19 cannisters were deployed, multiple individuals, including HATFIELD, who was
20 captured on video, picked up the smoke cannisters and threw them back at SCSO
21 deputies and SPD officers. At least one canister hit an officer, and another hit a
22 patrol vehicle.

23 At approximately 9:00 pm, the Spokane SWAT team arrived, and those
24 SWAT officers and SCSO Deputies were finally able to escort agents, detainees,
25 and civilian employees safely from the federal facility. The detainees were
26 transported for their immigration hearings in Tacoma by federal agents at that time.

27 Defendant stipulates and agrees that Defendant entered into a conspiracy
28 with the charged Co-Defendants, as well as other unindicted Co-Conspirators, to

1 obstruct and impede officers of the United States. Defendant further stipulates and
2 agrees that the object of the conspiracy was to prevent by force, intimidation, or
3 threat an officer of the United States from discharging their official duties, and to
4 injure an officer of the United States in his person or property on account of his
5 lawful discharge of his official duties or while engaged in the lawful discharge
6 therefore, and to injure the property of an officer of the United States so as to
7 molest, interrupt, hinder, or impede him in the discharge of his official duties.

8 9. The United States' Agreements

9 The United States Attorney's Office for the Eastern District of Washington
10 agrees not to bring additional charges against Defendant based on information in
11 its possession at the time of this Plea Agreement that arise from conduct that is
12 either charged in the Indictment or identified in discovery produced in this case,
13 unless Defendant breaches this Plea Agreement before sentencing.

14 Specifically, the United States agrees not to bring additional felony charges
15 against Defendant for *Depredation of Property of the United States in an Amount*
16 *Exceeding \$1000*, in violation of 18 U.S.C. §§ 1361 and 2.

17 10. United States Sentencing Guidelines Calculations

18 Defendant understands and acknowledges that the United States Sentencing
19 Guidelines ("U.S.S.G." or "Guidelines") apply and that the Court will determine
20 Defendant's advisory range at the time of sentencing, pursuant to the Guidelines.
21 The United States and Defendant agree to the following Guidelines calculations.

22 a. Base Offense Level

23 The United States and Defendant agree that the base offense level is 10.
24 U.S.S.G. §§ 2X1.1, 2A2.4.

25 b. Special Offense Characteristics

26 The United States and Defendant agree that Defendant's base offense level
27 is increased by 3 levels because the offense involved physical contact. U.S.S.G.
28 § 2A2.4(b)(1)(A).

1 c. Zero Point Offender

2 Defendant may be eligible for a reduction pursuant to U.S.S.G. § 4C1.1. The
3 United States and Defendant are free to argue for or against the application of
4 U.S.S.G. § 4C1.1 at sentencing.

5 d. Acceptance of Responsibility

6 The United States will recommend that Defendant receive a downward
7 adjustment for acceptance of responsibility, pursuant to U.S.S.G. § 3E1.1(a), if
8 Defendant does the following:

- 9 i. accepts this Plea Agreement;
- 10 ii. enters a guilty plea at the first Court hearing that takes
11 place after the United States offers this Plea Agreement;
- 12 iii. demonstrates recognition and affirmative acceptance of
13 Defendant's personal responsibility for Defendant's
14 criminal conduct;
- 15 iv. provides complete and accurate information during the
16 sentencing process; and
- 17 v. does not commit any obstructive conduct.

18 The United States and Defendant agree that at its option and on written
19 notice to Defendant, the United States may elect not to recommend a reduction for
20 acceptance of responsibility if, prior to the imposition of sentence, Defendant is
21 charged with, or convicted of, any criminal offense, or if Defendant tests positive
22 for any controlled substance.

23 e. Agreements Regarding Representations to the Court

24 The United States has a duty of candor to the tribunal. If the United States
25 and Defendant do not agree on the appropriate length of incarceration, the
26 appropriate length or applicable terms of supervised release, and/or the correct
27 guidelines calculations, variances, departures, and/or enhancements, the United
28 States reserves the right to respond to any and all arguments made by Defendant,

1 on any bases the United States deems appropriate, at all stages of this criminal
2 case.

3 Defendant may make any arguments it deems appropriate, at all stages of
4 this criminal case.

5 With regard to all briefing, submissions, and hearings in this criminal case,
6 the United States and Defendant agree to the following provisions:

7 i. The United States and Defendant may each respond to
8 any questions from the Court or United States Probation
9 Office;

10 ii. The United States and Defendant may each supplement
11 the facts under consideration by the Court by providing
12 information the United States or Defendant deems
13 relevant;

14 iii. The United States and Defendant may each present and
15 argue any additional facts that the United States or
16 Defendant believe are relevant to the Sentencing
17 Guidelines computation or sentencing;

18 iv. The United States and Defendant may each present and
19 argue information that may already be known to the
20 Court, including information contained in the
21 Presentence Investigation Report;

22 v. The United States and Defendant may each respond to
23 any arguments presented by the other;

24 vi. In order to support the United States' sentencing
25 recommendation as set forth herein, the United States
26 may oppose and argue against any defense argument or
27 any recommendation for any sentence lower than the
28 sentence recommended by the United States on any basis,

1 including arguments for a lower offense level, a lower
2 criminal history calculation, the application or non-
3 application of any sentencing enhancement or departure,
4 and/or any variance from the Guidelines range as
5 calculated by the Court;

6 vii. In order to support the defense sentencing
7 recommendation as set forth herein, Defendant may
8 oppose and argue against any argument by the United
9 States, or any recommendation for any sentence higher
10 than the sentence recommended by the defense on any
11 basis, including arguments for a higher offense level, a
12 higher criminal history calculation, the application or
13 non-application of any sentencing enhancement or
14 departure, and/or any variance from the Guidelines range
15 as calculated by the Court;

16 viii. The United States may make any sentencing arguments
17 the United States deems appropriate so long as they are
18 consistent with this Plea Agreement, including arguments
19 arising from Defendant's uncharged conduct, conduct set
20 forth in charges that will be dismissed pursuant to this
21 Plea Agreement, and Defendant's relevant conduct; and

22 ix. Defendant may make any sentencing arguments
23 consistent with this Plea Agreement Defendant deems
24 appropriate.

25 f. No Other Agreements

26 The United States and Defendant have no other agreements regarding the
27 Guidelines or the application of any Guidelines enhancements, departures, or
28 variances.

1 g. Criminal History

2 The United States and Defendant have no agreement and make no
3 representations about Defendant's criminal history category, which will be
4 determined by the Court after the United States Probation Office prepares and
5 discloses a Presentence Investigative Report.

6 11. Incarceration

7 At the time of Defendant's original sentencing in the District Court, the
8 United States agrees to make a sentencing recommendation to the Court that is
9 consistent with this Plea Agreement. The United States' agreement to make such a
10 recommendation is limited exclusively to the time of Defendant's original
11 sentencing in the District Court. The United States' agreement to make such a
12 recommendation does not prohibit or limit in any way the United States' ability to
13 argue for or against any future sentencing modification that takes place after
14 Defendant's original sentencing in the District Court, whether that modification
15 consists of an amendment to the Guidelines, a change to a statutory minimum or
16 maximum sentence, any form of compassionate release, any violation of
17 Supervised Release, or any other modification that is known or unknown to the
18 parties at the time of Defendant's original criminal sentencing. In this Plea
19 Agreement, the United States makes no promises or representations about what
20 positions the United States will take or recommendations the United States will
21 make in any proceeding that occurs after Defendant's original sentencing in the
22 District Court.

23 The United States and Defendant may each recommend any legal sentence.

24 12. Supervised Release

25 The United States and Defendant each agree to recommend 3 years of
26 supervised release. Defendant agrees that the Court's decision regarding the
27 conditions of Defendant's Supervised Release is final and non-appealable; that is,
28 even if Defendant is unhappy with the conditions of Supervised Release ordered by

1 the Court, that will not be a basis for Defendant to withdraw Defendant's guilty
2 plea, withdraw from this Plea Agreement, or appeal Defendant's conviction,
3 sentence, or any term of Supervised Release.

4 The United States and Defendant agree to recommend that in addition to the
5 standard conditions of supervised release imposed in all cases in this District, the
6 Court should also impose the following conditions:

7 a. The United States Probation Officer may conduct, upon
8 reasonable suspicion, and with or without notice, a search of
9 Defendant's person, residences, offices, vehicles, belongings,
10 and areas under Defendant's exclusive or joint control.

11 b. Defendant shall participate and complete such drug testing and
12 drug treatment programs as the Probation Officer directs; and
13 any treatment program as ordered by the Court

14 Defendant shall complete mental health evaluations and treatment if directed
15 by the Probation Officer; and any treatment as ordered by the Court. Defendant
16 shall take any non-psychotropic medications prescribed by the treatment provider.
17 Defendant shall allow reciprocal release of information between the Probation
18 Officer and the treatment provider. Defendant shall contribute to the cost of
19 treatment according to the Defendant's ability.

20 13. Criminal Fine

21 The United States and Defendant may make any recommendation
22 concerning the imposition of a criminal fine. Defendant acknowledges that the
23 Court's decision regarding a fine is final and non-appealable; that is, even if
24 Defendant is unhappy with a fine ordered by the Court, that will not be a basis for
25 Defendant to withdraw Defendant's guilty plea, withdraw from this Plea
26 Agreement, or appeal Defendant's conviction, sentence, or fine.

1 14. Mandatory Special Penalty Assessment

2 Defendant agrees to pay the \$100 mandatory special penalty assessment to
3 the Clerk of Court for the Eastern District of Washington, pursuant to 18 U.S.C.
4 § 3013.

5 15. Restitution

6 The United States and Defendant agree that restitution is appropriate and
7 mandatory, without regard to Defendant's economic situation, pursuant to 18
8 U.S.C. §§ 3663, 3663A, 3664. Pursuant to 18 U.S.C. § 3663(a)(3), Defendant
9 voluntarily agrees to pay restitution for all losses caused by Defendant's conduct,
10 in exchange for the United States not bringing additional potential charges,
11 regardless of whether counts associated with such losses will be dismissed as part
12 of this Plea Agreement. With respect to restitution, the United States and
13 Defendant agree to the following:

14 a. Restitution Amount and Interest

15 The United States and Defendant stipulate and agree that the Court should
16 order restitution in an amount of \$10,873.39, and that interest on this restitution
17 amount, if any, should be waived. The United States and Defendant stipulate and
18 agree that this restitution amount should be joint and several with any restitution
19 ordered for any other Defendants in this case.

20 b. Payments

21 To the extent restitution is ordered, the United States and Defendant agree
22 that the Court will set a restitution payment schedule based on Defendant's
23 financial circumstances. 18 U.S.C. § 3664(f)(2), (3)(A). Regardless, Defendant
24 agrees to pay not less than 10% of Defendant's net monthly income towards
25 restitution.

26 c. Treasury Offset Program and Collection

27 Defendant understands the Treasury Offset Program ("TOP") collects
28 delinquent debts owed to federal agencies. If applicable, the TOP may take part or

1 all of Defendant's federal tax refund, federal retirement benefits, or other federal
2 benefits and apply these monies to Defendant's restitution obligations. 26 U.S.C.
3 § 6402(d); 31 U.S.C. § 3720A; 31 U.S.C. § 3716.

4 Defendant understands that the United States may, notwithstanding the
5 Court-imposed payment schedule, pursue other avenues to ensure the restitution
6 obligation is satisfied, including, but not limited to, garnishment of available funds,
7 wages, or assets. 18 U.S.C. §§ 3572, 3613, and 3664(m).

8 Nothing in this acknowledgment shall be construed to limit Defendant's
9 ability to assert any specifically identified exemptions as provided by law, except
10 as set forth in this Plea Agreement.

11 Until Defendant's fine and restitution obligations are paid in full, Defendant
12 agrees fully to disclose all assets in which Defendant has any interest or over
13 which Defendant exercises control, directly or indirectly, including those held by a
14 spouse, nominee or third party.

15 Until Defendant's fine and restitution obligations are paid in full, Defendant
16 agrees to provide waivers, consents, or releases requested by the U.S. Attorney's
17 Office to access records to verify the financial information.

18 d. Obligations, Authorizations, and Notifications

19 Defendant agrees to truthfully complete the Financial Disclosure Statement
20 that will be provided by the earlier of 30 days from Defendant's signature on this
21 plea agreement or the date of Defendant's entry of a guilty plea, sign it under
22 penalty of perjury, and provide it to both the United States Attorney's Office and
23 the United States Probation Office. Defendant acknowledges and understands that
24 Defendant's failure to timely and accurately complete and sign the Financial
25 Disclosure Statement, and any update thereto, may, in addition to any other penalty
26 or remedy, constitute Defendant's failure to accept responsibility under U.S.S.G
27 §3E1.1.
28

1 Defendant expressly authorizes the United States Attorney's Office to obtain
2 a credit report on Defendant upon the signing of this Plea Agreement. Until
3 Defendant's fine and restitution orders are paid in full, Defendant agrees to provide
4 waivers, consents or releases requested by the United States Attorney's Office to
5 access records to verify the financial information.

6 Defendant agrees to notify the Financial Litigation Unit of the United States
7 Attorney's Office before Defendant transfers any interest in property with a value
8 exceeding \$1,000 owned directly or indirectly, individually or jointly, by
9 Defendant, including any interest held or owned under any name, including trusts,
10 partnerships and corporations. Further, pursuant to 18 U.S.C. § 3664(k),
11 Defendant shall notify the court and the United States Attorney's Office within a
12 reasonable period of time, but no later than within 10 days, of any material change
13 in Defendant's economic circumstances that might affect defendant's ability to pay
14 restitution, including, but not limited to, new or changed employment, increases in
15 income, inheritances, monetary gifts or any other acquisition of assets or money.

16 Until Defendant's fine and restitution orders are paid in full, Defendant
17 agrees to disclose all assets in which Defendant has any interest or over which
18 Defendant exercises control, directly or indirectly, including those held by a
19 spouse, nominee or third party.

20 Pursuant to 18 U.S.C. § 3612(b)(1)(F), Defendant understands and agrees
21 that until Defendant's fine and restitution orders are paid in full, Defendant must
22 notify the United States Attorney's Office of any change in the mailing address or
23 residence address within 30 days of the change.

24 16. Payments While Incarcerated

25 If Defendant lacks the financial resources to pay the monetary obligations
26 imposed by the Court, Defendant agrees to earn money toward these obligations by
27 participating in the Bureau of Prisons' Inmate Financial Responsibility Program.

28 //

1 17. Additional Violations of Law Can Void Plea Agreement

2 The United States and Defendant agree that the United States may, at its
3 option and upon written notice to the Defendant, withdraw from this Plea
4 Agreement or modify its sentencing recommendation if, prior to the imposition of
5 sentence, Defendant is charged with or convicted of any criminal offense or tests
6 positive for any controlled substance.

7 18. Waiver of Appeal Rights

8 Defendant understands that Defendant has a limited right to appeal or
9 challenge Defendant's conviction and the sentence imposed by the Court.

10 In return for the concessions that the United States has made in this Plea
11 Agreement, Defendant expressly waives any and all of Defendant's rights to
12 appeal any and all aspects of Defendant's conviction and any and all aspects of the
13 sentence the Court imposes, on any and all grounds, unless the Court exceeds the
14 statutory maximum.

15 Defendant expressly waives Defendant's right to appeal any fine, term of
16 supervised release, or restitution order imposed by the Court.

17 Defendant expressly waives the right to file any post-conviction motion
18 attacking Defendant's conviction and sentence, including a motion pursuant to 28
19 U.S.C. § 2255, except one based on ineffective assistance of counsel arising from
20 information not now known by Defendant and which, in the exercise of due
21 diligence, Defendant could not know by the time the Court imposes sentence.

22 Nothing in this Plea Agreement shall preclude the United States from
23 opposing any post-conviction motion for a reduction of sentence or other attack
24 upon the conviction or sentence, including, but not limited to, writ of habeas
25 corpus proceedings brought pursuant to 28 U.S.C. § 2255.

1 19. Withdrawal or Vacatur of Defendant’s Plea

2 Should Defendant successfully move to withdraw from this Plea Agreement
3 or should Defendant’s conviction be set aside, vacated, reversed, or dismissed
4 under any circumstance, then:

- 5 a. Any obligations, commitments, or representations made by the
6 United States in this Plea Agreement shall become null and
7 void;
8 b. The United States may prosecute Defendant on all available
9 charges;
10 c. The United States may reinstate any counts that have been
11 dismissed, have been superseded by the filing of another
12 charging instrument, or were not charged because of this Plea
13 Agreement; and
14 d. The United States may file any new charges that would
15 otherwise be barred by this Plea Agreement.

16 The decision to pursue any or all of these options is solely in the discretion
17 of the United States Attorney’s Office.

18 Defendant agrees to waive any objections, motions, and/or defenses
19 Defendant might have to the United States’ decisions to seek, reinstate, or reinstate
20 charges if a count of conviction is withdrawn, set aside, vacated, reversed, or
21 dismissed, including any claim alleging a violation of Double Jeopardy.

22 Defendant agrees not to raise any objections based on the passage of time,
23 including alleged violations of any statutes of limitation or any objections based on
24 the Speedy Trial Act or the Speedy Trial Clause of the Sixth Amendment.

25 20. Integration Clause

26 The United States and Defendant acknowledge that this document
27 constitutes the entire Plea Agreement between the United States and Defendant.
28 This Plea Agreement, accompanied by the concurrently filed Deferred Sentencing

1 Agreement constitutes the entire agreement between the parties, and no other
2 promises, agreements, or conditions exist between the United States and Defendant
3 concerning the resolution of the case.

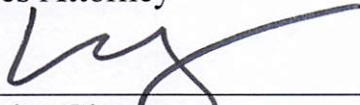
4 This Plea Agreement is binding only on the United States Attorney's Office
5 for the Eastern District of Washington, and cannot bind other federal, state, or local
6 authorities.

7 The United States and Defendant agree that this Agreement cannot be
8 modified except in a writing that is signed by the United States and Defendant.

9 Approvals and Signatures

10 Agreed and submitted on behalf of the United States Attorney's Office for
11 the Eastern District of Washington.

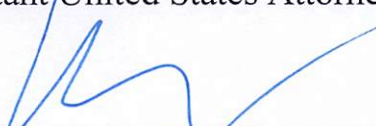
12 S. Peter Serrano
13 United States Attorney



12/9/2025

14 _____
15 Lisa C. Cartier Giroux
16 Assistant United States Attorney

Date



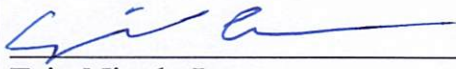
17 _____
18 Rebecca R. Perez
19 Assistant United States Attorney

Date

12/9/25

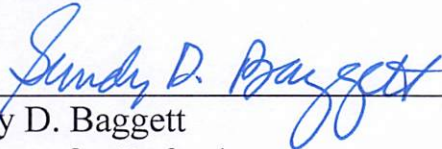
20
21
22
23 I have read this Plea Agreement and I have carefully reviewed and discussed
24 every part of this Plea Agreement with my attorney. I understand the terms of this
25 Plea Agreement. I enter into this Plea Agreement knowingly, intelligently, and
26 voluntarily. I have consulted with my attorney about my rights, I understand those
27 rights, and I am satisfied with the representation of my attorney in this case. No
28 other promises or inducements have been made to me, other than those contained

1 in this Plea Agreement. No one has threatened or forced me in any way to enter
2 into this Plea Agreement. I agree to plead guilty because I am guilty.

3 
4 _____
5 Erin Nicole Lang
6 Defendant

12-9-25
7 _____
8 Date

9 I have read the Plea Agreement and have discussed the contents of the
10 agreement with my client. The Plea Agreement accurately and completely sets
11 forth the entirety of the agreement between the parties. I concur in my client's
12 decision to plead guilty as set forth in the Plea Agreement. There is no legal
13 reason why the Court should not accept Defendant's guilty plea.

14 
15 _____
16 Sandy D. Baggett
17 Attorney for Defendant

12/9/25
18 _____
19 Date