



U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia

*Patrick Henry Building
601 D Street, N.W.
Washington, D.C. 20530*

November 27, 2024

Charles Haskell, Esq.
Via Email

Re: United States v. **Kris Estrada**
Case No. 2024 CMD 007577

Dear Counsel:

This agreement sets forth the full and complete plea offer for your client, from the Office of the United States Attorney for the District of Columbia (hereinafter also referred to as “the Government” or “this Office”). This plea offer will remain open until **January 15, 2025**. However, the Government reserves the right to revoke this plea offer at any time before your client enters a guilty plea in this case. If your client accepts the terms and conditions set forth below, please have your client execute this document in the space provided below. Upon receipt of the executed document, this agreement will become the plea agreement between your client and the Government. The terms of the offer are as follows:

1. Your client agrees to admit guilt and enter a plea of guilty to the following offense: **five (5) counts of Voyeurism** in violation of DC Code 22-3531. Your client understands that each count of the offense of **Voyeurism**, which is a misdemeanor in the District of Columbia, carries a potential maximum penalty of **1 years’ imprisonment and/or a \$2,500 fine**. Your client further understands that, pursuant to 16 D.C. Code § 711, the Court may, in addition to any other sentence imposed as a condition of probation or as a sentence itself, require your client to make reasonable restitution or reparation, pursuant to the factors set forth therein.
2. Your client understands that the Government will **reserve stepback pending sentencing,¹ will waive any sentencing enhancement papers**, and will reserve allocation at sentencing, subject to the terms set forth in Paragraph 5 of this agreement.
3. Your client understands that the Government agrees that it will **dismiss any greater or remaining counts of the complaint at the time of sentencing** and agree not to indict on any greater or additional charges arising out of the conduct in this case.
4. The parties further agree that your client, after taking an oath to tell the truth, shall agree to the attached factual proffer in open court on the date of the plea and acknowledge under oath that the statements in the factual proffer are true.

¹ If your client remains compliant with all release conditions, the government will not oppose continued release pending sentencing.

5. Your client understands that the Court may utilize the District of Columbia Sentencing Commission's Voluntary Sentencing Guidelines in imposing the sentence in this case. The Government and your client agree that neither party will seek an upward or downward departure outside of your client's applicable guidelines range, unless the specific basis for such a departure is identified and is set forth in this agreement. Your client further understands that the applicable guidelines range will not be determined by the Court until the time of sentencing. **The government agrees not to oppose a fully suspended sentence and the defendant agrees not to oppose a term of probation of 36 months and conditions of probation requiring adherence to a therapeutic plan of treatment.**

6. Your client agrees that this agreement is binding on the Government and the defendant, but not binding on the Court, and that your client cannot withdraw this plea at a later date because of the harshness of any sentence imposed by the Court. The Government understands that your client is not bound by the Government's allocution, and may request a lesser sentence, subject to the terms set forth in Paragraph 5, above.

7. In entering this plea of guilty, your client understands and agrees to waive certain rights afforded to your client by the Constitution of the United States and/or by statute. Your client knowingly and voluntarily waives or gives up his right against self-incrimination with respect to the offense(s) to which your client is pleading guilty before the Court which accepts your client's plea. Your client also understands that by pleading guilty your client is waiving or giving up your client's right to be tried by a jury or by a judge sitting without a jury, the right to be assisted by an attorney at trial and the right to confront and cross-examine witnesses.

8. Your client agrees to waive, insofar as such waiver is permitted by law, the right to direct appeal the conviction in this case, including but not limited to claim(s) that (1) the statute(s) to which your client is pleading guilty is unconstitutional, and (2) the admitted conduct does not fall within the scope of the statute(s). Your client also agrees to waive the right to appeal the sentence in this case, including but not limited to any term of imprisonment, fine, forfeiture, award of restitution, term or condition of supervised release, authority of the Court to set conditions of release, except to the extent the Court imposes an illegal sentence, or imposes the sentence in an illegal manner. In agreeing to this waiver, your client is aware that your client's sentence has yet to be determined by the Court. Realizing the uncertainty in estimating what sentence the Court ultimately will impose, your client knowingly and willingly waives your client's right to appeal the sentence, to the extent noted above, in exchange for the concessions made by the Government in this Agreement. Notwithstanding the above agreement to waive the right to appeal the conviction and sentence, your client retains the right to appeal on the basis of ineffective assistance of counsel or the imposition of an illegal sentence, or a sentence imposed in an illegal manner, but not to raise on appeal other issues regarding the conviction or sentence.

9. This agreement sets forth the entire understanding between the parties and constitutes the complete plea agreement between your client and the United States Attorney's Office for the District of Columbia. This agreement supersedes all prior understandings, promises, agreements, or conditions, if any, between this Office and your client.

Respectfully,

Matthew M. Graves
United States Attorney

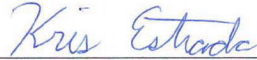
By: _____/s/_____
RICHARD KELLEY
Assistant United States Attorney

DEFENDANT'S ACCEPTANCE

I have read this plea agreement and factual proffer and have discussed it with my attorney. I fully understand this agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound, and no threats have been made to me. I am not under the influence of anything that could impede my ability to understand this agreement fully. I am pleading guilty because I am in fact guilty of the offenses set forth herein.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this plea agreement. I am satisfied with the legal services provided by my attorney in connection with this plea agreement and matters related to it.

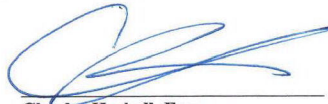
Date: 12/09/2024


Kris Estrada
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read each of the pages constituting this plea agreement, reviewed them with my client, and discussed the provisions of the agreement with my client, fully. These pages accurately and completely set forth the entire plea agreement.

Date: 12.9.24


Charles Haskell, Esq.
Attorney for Defendant



U.S. Department of Justice

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United States Attorney

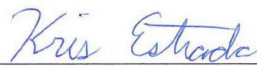
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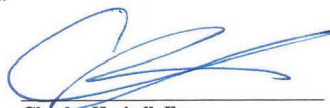
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