



**U.S. Department of Justice**

*United States Attorney  
Western District of Pennsylvania*

*Federal Courthouse  
17 South Park Row  
Room A330  
Erie, Pennsylvania 16501*

814/452-2906

June 1, 2026

D. Robert Marion Jr., Esquire  
617 South Pike Rd.  
Sarver, Pa 16055

Re: United States of America v.  
Lijuan Zhao  
Criminal No. 26-2 Erie

Dear Mr. Marion:

This letter sets forth the agreement by which your client, Lijuan Zhao, will enter a plea of guilty in the above-captioned case. The letter represents the full and complete agreement between Lijuan Zhao and the United States Attorney for the Western District of Pennsylvania. The agreement does not apply to or bind any other federal, state, or local prosecuting authority.

Upon entering a plea of guilty, Lijuan Zhao will be sentenced under the Sentencing Reform Act, 18 U.S.C. § 3551, et seq. and 28 U.S.C. § 991, et seq. The Sentencing Guidelines promulgated by the United States Sentencing Commission will be considered by the Court in imposing sentence. The facts relevant to sentencing shall be determined initially by the United States Probation Office and finally by the United States District Court by a preponderance of the evidence.

- A. The defendant, Lijuan Zhao, agrees to the following:
1. The defendant will enter a plea of guilty to Count One of the Indictment at Criminal No. 26-2 Erie, charging the defendant with violating 18 U.S.C. § 371, pursuant to Rule 11 of the Federal Rules of Criminal Procedure.
  2. The defendant acknowledges the defendant's responsibility for the conduct charged in Counts 4 and 5 of the Indictment at Criminal No. 26-2 Erie and stipulates that the conduct charged in those Counts may be considered by

**LIMITED OFFICIAL  
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the Probation Office or by the Court in calculating the guideline range and in imposing sentence.

3. At the time Lijuan Zhao enters the defendant's plea of guilty, the defendant will deposit a special assessment of \$100 in the form of cash, check, or money order payable to "Clerk, U.S. District Court." In the event that sentence is not ultimately imposed, the special assessment deposit will be returned.
4. Lijuan Zhao recognizes that pleading guilty may have consequences with respect to the defendant's immigration status if the defendant is not a citizen of the United States. Under federal law, a broad range of crimes are removable offenses. Removal and other immigration consequences, including denaturalization if the defendant is a naturalized citizen, are the subject of a separate proceeding, however, and defendant understands that no one, including the defendant's attorney or the district court, can predict to a certainty the effect of the defendant's conviction on the defendant's immigration status. Defendant nevertheless affirms that the defendant wants to plead guilty regardless of any immigration consequences that the defendant's plea may entail, even if the consequence is the defendant's automatic removal from the United States.
5. Lijuan Zhao waives the right to take a direct appeal from the defendant's conviction or sentence under 28 U.S.C. § 1291 or 18 U.S.C. § 3742, subject to the following exceptions:
  - (a) If the United States appeals from the sentence, Lijuan Zhao may take a direct appeal from the sentence.
  - (b) If (1) the sentence exceeds the applicable statutory limits set forth in the United States Code, or (2) the sentence unreasonably exceeds the guideline range determined by the Court under the Sentencing Guidelines, Lijuan Zhao may take a direct appeal from the sentence.

Defendant further waives the right to file a motion to vacate sentence under 28 U.S.C. § 2255, attacking the defendant's conviction or sentence and the right to file any other collateral proceeding attacking the defendant's conviction or sentence.

Nothing in the foregoing waivers of rights shall preclude the defendant from raising a claim of ineffective assistance of counsel in an appropriate forum, if otherwise permitted by law. The defendant understands that the government retains its right to oppose any such claim on procedural or substantive grounds.

6. In the event the judgment of conviction and sentence entered as a result of this plea agreement does not remain in full force and effect for any reason,

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the government may reinstate any charges dismissed or reduced pursuant to this plea agreement. In the event of reinstatement, the defendant waives any claim of double jeopardy, statute of limitations, speedy trial, or similar objections to any count reinstated.

B. In consideration of and entirely contingent upon the provisions of Parts A and C of this agreement, the United States Attorney for the Western District of Pennsylvania agrees to the following:

1. After the imposition of sentence and pursuant to Rule 11(c)(1)(A), the United States Attorney will move to dismiss the remaining counts of the Indictment at Criminal No. 26-2 Erie as to Lijuan Zhao, without prejudice to their reinstatement if, at any time, Lijuan Zhao is permitted to withdraw the defendant's plea of guilty. In that event, Lijuan Zhao waives any double jeopardy, statute of limitations, speedy trial, or similar objections to the reinstatement of any count dismissed pursuant to this agreement.
2. The United States Attorney retains the right of allocution at the time of sentencing to advise the sentencing Court of the full nature and extent of the involvement of Lijuan Zhao in the offenses charged in the Indictment and of any other matters relevant to the imposition of a fair and just sentence.
3. The United States agrees to recommend a two-level downward adjustment for acceptance of responsibility. However, if at any time prior to imposition of the sentence, the defendant fails to fully satisfy the criteria set forth in U.S.S.G. § 3E1.1 or acts in a manner inconsistent with acceptance of responsibility, the United States will not make or, if already made, will withdraw this recommendation and/or motion.
4. The United States will take any position deemed appropriate in the course of any appeals from the sentence or in response to any post-sentence motions.

C. Lijuan Zhao and the United States Attorney further understand and agree to the following:

1. The penalty that may be imposed upon Lijuan Zhao at Count One is:
  - (a) A term of imprisonment of not more than five (5) years;
  - (b) A fine of not more than \$250,000;
  - (c) A term of supervised release of not more than three (3) years; and
  - (d) A special assessment under 18 U.S.C. § 3013 of \$100.

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2. This agreement does not preclude the government from pursuing any civil or administrative remedies against Lijuan Zhao or the defendant's property.
3. If, at any time after this plea agreement is signed and prior to sentencing, the defendant (i) commits any additional federal, state, or local offense; or (ii) breaches any term of this plea agreement, the United States may at its discretion be released from its obligations under this agreement and the defendant's guilty plea, if already entered, will stand. In that event, the United States will be entitled to seek a sentence other than agreed-upon, reinstate previously dismissed or reduced charges and/or pursue additional charges against the defendant. The defendant waives any claim of double jeopardy, statute of limitations, speedy trial, or similar objections to any count reinstated.

Any alleged breach of this plea agreement shall be determined by agreement of the parties or by the Court. A breach of this plea agreement shall be established by a preponderance of the evidence.

4. The parties agree that, although charges are to be dismissed pursuant to this agreement, Lijuan Zhao is not a prevailing party for the purpose of seeking attorney fees or other litigation expenses under Pub. L. No. 105-119, § 617 (Nov. 26, 1997) (known as the Hyde Amendment). Lijuan Zhao waives any right to recover attorney fees or other litigation expenses under the Hyde Amendment.
5. Pursuant to the Standing Order of the United States District Court dated May 31, 2017, all plea letters shall include a sealed Supplement. The sealed Supplement to this plea letter is part of the agreement between the parties hereto.

This letter sets forth the full and complete terms and conditions of the agreement between Lijuan Zhao and the United States Attorney for the Western District of Pennsylvania, and there are no other agreements, promises, terms or conditions, express or implied.

Very truly yours,



TROY RIVETTI  
United States Attorney



PAUL S. SELLERS  
Assistant United States Attorney

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I have received this letter from my attorney, D. Robert Marion Jr., Esquire, have read it and discussed it with him, and I understand the terms of the Agreement. I hereby voluntarily accept it and acknowledge that it fully sets forth my agreement with the Office of the United States Attorney for the Western District of Pennsylvania. I affirm that there have been no additional promises or representations made to me by any agents or officials of the United States in connection with this matter.

X 赵丽娟

LIJUAN ZHAO

6-17-26

Date

Witnessed by:



D. ROBERT MARION JR., ESQUIRE  
Counsel for Lijuan Zhao