

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
v. § CRIMINAL NO. 4:19-CR-180-S1
ROBERT ALEXANDER SHOUSE, §
Defendant. §

PLEA AGREEMENT

The United States of America, by and through Alamdar S. Hamdani, United States Attorney for the Southern District of Texas, and Kimberly Ann Leo, Assistant United States Attorney, and James E. Burke, IV, Trial Attorney U.S. Department of Justice, Criminal Division, and the defendant, Robert Alexander Shouse (“Defendant”), and Defendant's counsel, Dan Cogdell and Cordt Akers, pursuant to Rule 11(c)(1)(A) and 11(c)(1)(B) of the Federal Rules of Criminal Procedure, state that they have entered into an agreement, the terms and conditions of which are as follows:

Defendant's Agreement

1. Defendant agrees to plead guilty to Counts One through Four of the superseding criminal information. Counts One and Two charges Defendant with Sexual Exploitation of Children, in violation of Title 18, United States Code, Section 2251 (a) and (e). Count Three charges Defendant with Attempted Sexual Exploitation of Children, in violation of Title 18, United States Code, Section 2251 (a) and (e). Count Four charges Defendant with Possession of Child Pornography in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2). Defendant, by entering this plea, agrees that he/she is waiving any right to have the facts that the law makes essential to the punishment either charged in the indictment/information, or proved to a jury or proven beyond a reasonable doubt.

Punishment Range

2. The **statutory** maximum penalty for each violation of Title 18, United States Code, Section 2250 (a) and (e), is imprisonment of not less than 15 years nor more than 30 years and a fine of not more than \$250,000. The **statutory** maximum penalty for each violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2) is imprisonment of not more than 10 years and a fine of not more than \$250,000. With a conviction for Counts One through Three, there is mandatory restitution under Title 18, United States Code, Section 2259. Additionally, with a conviction for Count Four, there is mandatory restitution under Title 18, United States Code, Section 2259 which is not less than \$3,000.00 per victim. Further, under Counts One through Four, Defendant may receive a term of supervised release after imprisonment of at least 5 years to life. *See* Title 18, United States Code, sections Section 3583(k). Defendant acknowledges and understands that if he should violate the conditions of any period of supervised release which may be imposed as part of his sentence, then Defendant may be imprisoned for the entire term of supervised release, without credit for time already served on the term of supervised release prior to such violation. *See* Title 18, United States Code, sections 3559(a)(3) and 3583(k). Defendant understands that the sentences on multiple counts may be imposed to run consecutively to one another or to any other sentence. Defendant understands that he/she cannot have the imposition or execution of the sentence suspended, nor is he/she eligible for parole.

Mandatory Special Assessment

3. Pursuant to Title 18, United States Code, Section 3013(a)(2)(A), immediately after sentencing, Defendant will pay to the Clerk of the United States District Court a special assessment in the amount of one hundred dollars (\$100.00) per count of conviction. The payment will be by

cashier's check or money order, payable to the Clerk of the United States District Court, c/o District Clerk's Office, P.O. Box 61010, Houston, Texas 77208, Attention: Finance.

4. Pursuant to Title 18, United States Code, Section 3014(a)(3), if the court determines that the Defendant is a non-indigent person, the Defendant will pay to the Clerk of the United States District Court a special assessment in the amount of five thousand dollars (\$5000.00) per count of conviction. The payment will be by cashier's check or money order, payable to the Clerk of the United States District Court, c/o District clerk's Office, P.O. Box 61010, Houston, TX 77208, Attention: Finance.

5. Pursuant to Title 18, United States Code, Section 2259A, in addition to any other criminal penalty, restitution, or special assessment authorized by law, the Court shall assess no more than

- (1) \$17,000.00 if the Defendant is convicted of 18 U.S.C. §2252(a)(4) or §2252A(a)(5);
- (2) \$35,000.00 if the Defendant is convicted of any other trafficking in child pornography offenses as defined by §2259(c)(3), which includes offenses under 18 U.S.C. §§2251 (d), 2252(a)(1) through (3), 2252A(a)(1) through (4), 2252A(g) (in cases in which the series of felony violations exclusively involves violations of sections 2251(d), 2252, 2252A(a)(1) through (5), or 2260(b)), or 2260(b);
- (3) \$50,000.00 if the Defendant is convicted of child pornography production as defined by 18 U.S.C. §2259(c)(1), which includes offenses under 18 U.S.C. §2251(a) through (c), 2251A, 2252A(g) (in cases in which the

series of felony violations involves at least 1 of the violations listed in this subsection), 2260(a) or any offense under chapter 109A or chapter 117 that involved the production of child pornography.

The payment will be by cashier's check or money order, payable to the Clerk of the United States District Court, c/o District clerk's Office, P.O. Box 61010, Houston, TX 77208, Attention: Finance.

Immigration Consequences

6. Defendant recognizes that pleading guilty may have consequences with respect to his/her immigration status. Defendant understands that if he/she is not a citizen of the United States, by pleading guilty he/she may be removed from the United States, denied citizenship, and denied admission to the United States in the future. Defendant understands that if he/she is a naturalized United States citizen, pleading guilty may result in immigration consequences, such as denaturalization and potential deportation or removal from the United States. Defendant's attorney has advised Defendant of the potential immigration consequences resulting from Defendant's plea of guilty, and Defendant affirms that he/she wants to plead guilty regardless of any immigration consequences that may result from the guilty plea and conviction.

Waiver of Appeal, Collateral Review, and Statute of Limitations

7. Defendant is aware that Title 28, United States Code, Section 1291, and Title 18, United States Code, Section 3742, afford a defendant the right to appeal the conviction and sentence imposed. Defendant is also aware that Title 28, United States Code, Section 2255, affords the right to contest or "collaterally attack" a conviction or sentence after the judgment of conviction and sentence has become final. Defendant knowingly and voluntarily waives the right to appeal or

“collaterally attack” the conviction and sentence, except that Defendant does not waive the right to raise a claim of ineffective assistance of counsel on direct appeal, if otherwise permitted, or on collateral review in a motion under Title 28, United States Code, Section 2255. In the event Defendant files a notice of appeal following the imposition of the sentence or later collaterally attacks his conviction or sentence, the United States will assert its rights under this agreement and seek specific performance of these waivers.

8. Defendant also agrees that should the conviction following the defendant’s plea of guilty pursuant to this Agreement be vacated for any reason, then any prosecution that is not time-barred by the applicable statute of limitations on the date of the signing of this agreement (including any counts that the United States has agreed to dismiss at sentencing pursuant to this Agreement) may be commenced or reinstated against the defendant, notwithstanding the expiration of the statute of limitations between the signing of this Agreement and the commencement or reinstatement of such prosecution. It is the intent of this Agreement to waive all defenses based on the statute of limitations with respect to any prosecution that is not time-barred on the date that this Agreement is signed.

9. In agreeing to these waivers, Defendant is aware that a sentence has not yet been determined by the Court. Defendant is also aware that any estimate of the possible sentencing range under the sentencing guidelines that he/she may have received from his/her counsel, the United States or the Probation Office, is a prediction and not a promise, did not induce his/her guilty plea, and is not binding on the United States, the Probation Office or the Court. The United States does not make any promise or representation concerning what sentence the defendant will receive. Defendant further understands and agrees that the United States Sentencing Guidelines

are “effectively advisory” to the Court. *See United States v. Booker*, 543 U.S. 220 (2005). Accordingly, Defendant understands that, although the Court must consult the Sentencing Guidelines and must take them into account when sentencing Defendant, the Court is not bound to follow the Sentencing Guidelines nor sentence Defendant within the calculated guideline range.

10. Defendant understands and agrees that each and all waivers contained in the Agreement are made in exchange for the concessions made by the United States in this plea agreement.

The United States’ Agreements

11. The United States agrees to each of the following:

(a) If Defendant pleads guilty to Counts One through Four of the superseding criminal information and persists in that plea through sentencing, and if the Court accepts this plea agreement, the United States will move to dismiss the original indictment at the time of sentencing. The defendant agrees that with respect to any and all dismissed charges he/she is not a ‘prevailing party within the meaning of the ‘Hyde Amendment,’ Section 617, P.L. 105-119 (Nov. 26, 1997), and will not file any claim under that law;

(b) If the Court determines that Defendant qualifies for an adjustment under U.S.S.G. § 3E1.1(a), and the offense level prior to operation of § 3E1.1(a) is 16 or greater, the United States will move under § 3E1.1(b) for an additional one-level reduction because Defendant timely notified authorities of his or her intent to plead guilty, thereby permitting the United States to avoid preparing for trial and permitting the United States and the Court to allocate their resources more efficiently.

(c) The Government agrees to not seek a sentence of more than 50 years.

Agreement Binding - Southern District of Texas Only

12. The United States Attorney’s Office for the Southern District of Texas agrees that it will not further criminally prosecute Defendant in the Southern District of Texas for the specific conduct described in the indictment/information. This plea agreement binds only the United States

Attorney's Office for the Southern District of Texas and Defendant. It does not bind any other United States Attorney's Office. The United States Attorney's Office for the Southern District of Texas will bring this plea agreement and the full extent of Defendant's cooperation to the attention of other prosecuting offices, if requested.

United States' Non-Waiver of Appeal

13. The United States reserves the right to carry out its responsibilities under guidelines sentencing. Specifically, the United States reserves the right:

- (a) to bring the facts of this case, including evidence in the files of the United States Attorney's Office for the Southern District of Texas or the files of any investigative agency, to the attention of the Probation Office in connection with that office's preparation of a presentence report;
- (b) to set forth or dispute sentencing factors or facts material to sentencing;
- (c) to seek resolution of such factors or facts in conference with Defendant's counsel and the Probation Office;
- (d) to file a pleading relating to these issues, in accordance with section 6A1.2 of the United States Sentencing Guidelines and Title 18, United States Code, Section 3553(a); and
- (e) to appeal the sentence imposed or the manner in which it was determined.

Sentence Determination

14. Defendant is aware that the sentence will be imposed after consideration of the United States Sentencing Guidelines and Policy Statements, which are only advisory, as well as the provisions of Title 18, United States Code, Section 3553(a). Defendant nonetheless acknowledges and agrees that the Court has authority to impose any sentence up to and including the statutory maximum set for the offense(s) to which Defendant pleads guilty, and that the sentence to be imposed is within the sole discretion of the sentencing judge after the Court has consulted the

applicable Sentencing Guidelines. Defendant understands and agrees that the parties' positions regarding the application of the Sentencing Guidelines do not bind the Court and that the sentence imposed is within the discretion of the sentencing judge. If the Court should impose any sentence up to the maximum established by statute, or should the Court order any or all of the sentences imposed to run consecutively, Defendant cannot, for that reason alone, withdraw a guilty plea, and will remain bound to fulfill all of the obligations under this plea agreement.

Rights at Trial

15. Defendant understands that by entering into this agreement, he/she surrenders certain rights as provided in this plea agreement. Defendant understands that the rights of a defendant include the following:

(a) If Defendant persisted in a plea of not guilty to the charges, defendant would have the right to a speedy jury trial with the assistance of counsel. The trial may be conducted by a judge sitting without a jury if Defendant, the United States, and the court all agree.

(b) At a trial, the United States would be required to present witnesses and other evidence against Defendant. Defendant would have the opportunity to confront those witnesses and his/her attorney would be allowed to cross-examine them. In turn, Defendant could, but would not be required to, present witnesses and other evidence on his/her own behalf. If the witnesses for Defendant would not appear voluntarily, he/she could require their attendance through the subpoena power of the court; and

(c) At a trial, Defendant could rely on a privilege against self-incrimination and decline to testify, and no inference of guilt could be drawn from such refusal to testify. However, if Defendant desired to do so, he/she could testify on his/her own behalf.

Factual Basis for Guilty Plea

16. Defendant is pleading guilty because he/she is in fact guilty of the charges contained in Counts One through Four of the superseding criminal information. If this case were to proceed

to trial, the United States could prove each element of the offense beyond a reasonable doubt. The following facts, among others would be offered to establish Defendant's guilt:

This investigation involved an anonymization website (or “hidden service”) that allowed the facilitation of the sexual exploitation of minors while keeping the identities of the perpetrators secret. The hidden service was located on the so-called Tor network (an abbreviation of the “The Onion Router,” the primary global anonymization network currently in existence) and was an active online chat site whose primary purpose is to be a “chatroom for lovers of both boys and girls.”

The Defendant, Robert Alexander Shouse, was involved in a number of child exploitation sites, the most recent was a hidden service launched in or about 2018 and ceased operation in or about 2019 after law enforcement seized it during the course of their investigation. While it was operational, users of this site regularly advertised and distributed child pornography and child erotica on the site. It allowed users to engage in online chats with other users within chat rooms, some that were openly accessible to any user of the site, some within rooms only accessible to particular users, or in one-to-one chats between two users. Child pornography images and videos were trafficked through this chat site via the posting of web links within chat messages. These links allowed a user to navigate to other websites, like file-hosting websites—where images and/or videos are stored—in order to download images and videos of child pornography and child erotica.

Some users of this site communicated via an instant messaging service (“IMS”) that also operated on the Tor network. The IMS application used the Tor network protocols to render anonymous and private communications between IMS users.

This site allows users to see what status or rank other users have attained on the website.

The FBI's investigation revealed that the Defendant, Robert Alexander Shouse, held the rank of administrator for the site. Postings to the site that would have been available to any registered user at the time of posting were captured and archived for law enforcement review during the course of the investigation. Many of those postings included links to images and videos, which were also captured and archived.

According to FBI review of that information, FBI Special Agents observed that the Defendant, acting under a particular online alias, posted approximately 10,127 messages between March 28, 2018, and December 6, 2018. Several of the messages included links to child pornography and child erotica. Other messages discussed a sexual attraction to children, the dissemination of and conversation about child pornography, as well as the administration and moderation of the website itself.

In September 2018, FBI Special Agents executed a search warrant at the residence of, and then later arrested, another individual located in the United States ("S1") who was also an active member of site. FBI review of S1's digital devices found that S1 maintained an IMS account. For ease of communication, these IMS users could choose to assign a display name to the user's IMS contacts. One of S1's IMS contacts displayed the for an alias Defendant used on the site.

An FBI Special Agent acting in an undercover capacity ("UC") subsequently initiated contact with the Defendant via the IMS and chatted with him via IMS on multiple occasions. On one such occasion, the FBI UC accessed the site and chatted with the Defendant. The FBI UC also discussed the site's members with the Defendant. The context and content of those communications corroborated that the Defendant and the IMS user were the same person.

In November 2018, the FBI received credible information that the Defendant's IMS

account was being used from a computer at IP address 73.183.158.176, which was found to be owned/operated by Comcast. According to information provided by Comcast in response to a subpoena, as of May 20, 2018 that IP address was assigned to the Comcast internet service account at the Lake Bardwell Court residence and listed the Defendant's father as the owner of the account.

On November 26, 2018, the FBI established that the Defendant's IMS account was being used from a computer using the internet account at a Lake Bardwell Court residence, which is located within the Southern District of Texas.

On January 22, 2019, FBI Special Agents executed a search warrant at the Lake Bardwell Court residence where the Defendant and his father resided. The Defendant's father was present, but the Defendant was absent. The Defendant's father informed the agents that the Defendant could be found at another residence located in College Station, Texas. The FBI then executed a search warrant at that residence.

During the execution of the College Station residential search warrant, as well as the execution of additional search warrants, agents seized several electronic devices, including: an Apple IPAD, S/N DMPJ2XCODVGK, A1430; a Dell Laptop S/N 5M4MMC1, P/N UT153; a Geoforce Homebuilt Computer Tower; an HGST Hard Drive, S/N PEJP168S, P/N OF22408; an HGST Hard Drive, S/N PEHGZSBT, P/N OF22408; an HGST Hard Drive, S/N PEJNT2HS, P/N OF22408; a Lenovo Laptop, S/N CB18145049, Model 2099; a Samsung External Hard Drive, S/N S1DBNSBDC34494K, Model MZ-74E250; a WD External Hard Drive, S/N WCC4N4CLAU4U, P/N WDBCTL0030HWT; a Black Apple iPhone, Model A1660; a Black Apple iPhone, Model A1429; a Silver Apple IPAD, S/N F9GQNWWFCMF; an HP Laptop, S/N 5CD43061GJ; a Hoodman 32 GB Memory Card; a Pink 8 GB USB; a Nikon Camera, S/N 3059135; a Hoodman

32 GB Memory Card; a Black iPhone; a Dell Laptop, S/N 30LCWF2; a Dell laptop, Model PP27L; an HP Laptop, S/N CNF01718P0, Model 622ANHBMV; a White iPhone, Model A1532; and a Cell Phone (Damaged to where nothing can be determined).

During a forensic review of the seized devices, the agents found approximately 117,297 images and 1,183 videos which depicted children engaged in sexually explicit conduct, including oral, anal and vaginal penetration, masturbation, sadistic and masochistic conduct, and the lewd and lascivious exhibition of the genitals. Many of these children have been identified by NCMEC or FBI during the course of the investigation. Further, there were over 4,000 images which depicted infants and toddlers being sexually exploited that were recovered on a hard drive taken from the Defendant's residence.

One image discovered on the external hard drive depicts the bondage of a naked, prepubescent male who is chained to and hanging from a wooden structure, spread eagle, with what appear to be leather straps tied around his wrists and ankles. The image depicts the lewd and lascivious display of the prepubescent male's anus and genitals. Another image depicts the bondage of a naked, prepubescent male who is tied to a chair with what appears to be white rope. The rope is around the prepubescent male's wrists, right elbow, genitals, and ankles. The image depicts the lewd and lascivious display of the prepubescent male's genitals. A video discovered on an external hard drive depicts a naked, prepubescent male masturbating. The prepubescent male is bound by the ankles, wrists, and neck with a ball-gag in his mouth.

* * *

During the forensic review of the Defendant's devices, agents also found images and videos of six minor victims known to the Defendant.

The investigation revealed that the Defendant had created images and videos of Minor Victim 1 from on or about July 4, 2011, through on or about March 19, 2014. Law enforcement identified and interviewed Minor Victim 1. Minor Victim 1 resided within the Eastern District of Texas. He confirmed he had spent a lot of time alone with the Defendant and that the Defendant took images and videos of him, all within the Southern District of Texas, starting when he was approximately 10 years old. Minor Victim 1 said that the Defendant often used a Nikon camera to take the images and that he noticed a GoPro camera set up on one occasion. Minor Victim 1 also identified himself in several images found on the Defendant's digital devices.

In total, agents found approximately 925 images and 33 videos of child pornography of Minor Victim 1. One video, approximately 9 minutes in length, which was created on July 4, 2011, depicts the Defendant and Minor Victim 1 on a bed. The Defendant kisses Minor Victim 1 on the body and face, performs oral sex on Minor Victim 1, and manually manipulates Minor Victim 1's penis. Minor Victim 1 was prepubescent at the time. Another video, approximately 1 hour and 9 minutes in length, which was created on September 1, 2012, depicts the Defendant and Minor Victim 1 on a couch. The Defendant kisses Minor Victim 1, and Minor Victim 1 manually manipulates the Defendant's erect penis to the point of ejaculation. Minor Victim 1 was prepubescent. Another video, approximately 11 minutes in length, which was created on March 19, 2014, depicts the Defendant and Minor Victim 1 in a bedroom on a bed. The Defendant manually manipulates Minor Victim 1's penis and performs oral sex on Minor Victim 1. Minor Victim 1 manually manipulates the Defendant's penis in his underwear.

An image, which was created on July 9, 2013, depicts Minor Victim 1 nude, except for what appears to be a loose dog collar in his mouth. Minor Victim 1 is posed in the image, lying on

his back with his legs spread apart, and his genitals are lasciviously exhibited.

During the forensic review of the Defendant's devices, agents also found that the Defendant had created one video of Minor Victim 2 in or about 2011. Minor Victim 2 was known to the Defendant and resided in Florida. The Defendant surreptitiously recorded Minor Victim 2 as he was in the shower. Minor Victim 2 would have been approximately 14 years old at the time. During the video, Minor Victim 2 is seen naked with his genitals exposed for the camera's view.

Through the investigation, agents found that the Defendant had created five videos of Minor Victim 3 in or about July 2009. The Defendant surreptitiously recorded Minor Victim 3 in Minor Victim 3's bedroom. Minor Victim 3 would have been approximately 13 years old at the time. During the videos, Minor Victim 3 is in stages of undress and at times, Minor Victim 3 is seen naked with his genitals exposed for the camera's view.

Through the investigation, agents found child pornography images and videos of Minor Victim 4, Minor Victim 5 and Minor Victim 6 in the Defendant's collection.

* * *

The Defendant used Minor Victim 1 and Minor Victim 2 to engage in sexually explicit conduct for the purpose of creating a visual depiction of that conduct or attempted to, some in two federal districts in Texas, including the Southern District, and in Florida. Production of child pornography offenses are continuing offenses in the Southern District of Texas because the images and videos were located here. *See* 18 U.S.C. § 3237(a) (“[A]ny offense against the United States begun in one district and completed in another, or committed in more than one district, may be inquired of and prosecuted in any district in which such offense was begun, continued, or completed. Any offense involving the use of the mails, transportation in interstate or foreign

commerce . . . is a continuing offense and . . . may be inquired of and prosecuted in any district from, through, or into which such commerce . . . moves.”)

Further, the Defendant’s electronic devices were manufactured outside of the states of Texas and Florida. Consequently, the media at issue to produce and possess the child pornography must necessarily have traveled in interstate or foreign commerce.

Finally, the Defendant utilized the Internet, which is a means and facility of interstate and foreign commerce, to possess child pornography.

Breach of Plea Agreement

17. If Defendant should fail in any way to fulfill completely all of the obligations under this plea agreement, the United States will be released from its obligations under the plea agreement, and Defendant’s plea and sentence will stand. If at any time Defendant retains, conceals, or disposes of assets in violation of this plea agreement, including required financial information, or if Defendant knowingly withholds evidence or is otherwise not completely truthful with the United States, then the United States may move the Court to set aside the guilty plea and reinstate prosecution. Any information and documents that have been disclosed by Defendant, whether prior to or subsequent to this plea agreement, and all leads derived therefrom, will be used against defendant in any prosecution.

Monetary Penalties, Assets and Financial Disclosures

18. Defendant understands and agrees that monetary penalties will be subject to immediate enforcement as provided in 18 U.S.C. § 3613 and that monetary penalties will be submitted to the Treasury Offset Program so that payments to the Defendant may be applied to federal debts.

19. Defendant understands that restitution, forfeiture, and fines are separate components of sentencing and are separate obligations. Defendant agrees to take all steps necessary to pass clear title to forfeitable assets to the United States and to assist fully in the collection of restitution and fines. Subject to the provisions of paragraph 7 above, Defendant waives the right to challenge in any manner, including by direct appeal or in a collateral proceeding, any restitution order, any forfeiture orders, and any fines.

Restitution

20. Defendant agrees to pay full restitution to the victims regardless of the counts of conviction. Defendant stipulates and agrees that as a result of his criminal conduct, the victims incurred a monetary loss in an amount to be determined either before sentencing or within 90 days of the sentencing hearing. Defendant understands and agrees that the Court will determine the amount of restitution to fully compensate the victims pursuant to Title 18, United States Code, Section 2259(b)(2). Defendant understands that the amount is to be no less than \$3,000.00 per victim. Defendant agrees to pay full restitution as determined by the Court, regardless of the resulting loss amount, to all victims harmed by Defendant's "relevant conduct," as defined by U.S.S.G. §1B1.3, including conduct pertaining to any dismissed counts or uncharged conduct, and regardless of whether such conduct constitutes an "offense" under 18 U.S.C. §§ 2259, 3663 or 3663A. Defendant agrees that restitution imposed by the Court will be due and payable immediately and that should the Court impose a payment schedule, the payment schedule sets forth minimum payments and does not foreclose additional collection of restitution.

Forfeiture

21. As part of this plea agreement, Defendant agrees to the following:

(a) to forfeit, via either an administrative or judicial proceeding, all assets listed in the charging document (including any Supplemental Notice of Forfeiture), and to forfeit or abandon any assets seized during this investigation or a related investigation including but not limited to the following specific assets:

an Apple IPAD, S/N DMPJ2XCODVGK, A1430;

a Dell Laptop S/N 5M4MMC1, P/N UT153;

a GeForce Homebuilt Computer Tower;

an HGST Hard Drive, S/N PEJP168S, P/N OF22408;

an HGST Hard Drive, S/N PEHGZSBT, P/N OF22408;

an HGST Hard Drive, S/N PEJNT2HS, P/N OF22408;

a Lenovo Laptop, S/N CB18145049, Model 2099;

a Samsung External Hard Drive, S/N S1DBNSBDC34494K, Model MZ-74E250;

a WD External Hard Drive, S/N WCC4N4CLAU4U, P/N WDBCTL0030HWT;

a Black Apple iPhone, Model A1660;

a Black Apple iPhone, Model A1429;

a Silver Apple IPAD, S/N F9GQNWWFCMF;

an HP Laptop, S/N 5CD43061GJ;

a Hoodman 32 GB Memory Card;

a Pink 8 GB USB;

a Nikon Camera, S/N 3059135;

a Hoodman 32 GB Memory Card;

a Black iPhone;

a Dell Laptop, S/N 30LCWF2;

a Dell laptop, Model PP27L;

an HP Laptop, S/N CNF01718P0, Model 622ANHMV;

a White iPhone, Model A1532; and

a Cell Phone (Damaged to where nothing can be determined);

(b) to withdraw any claims and petitions for such listed or seized assets, whether in this proceeding or another proceeding, and to waive notice of administrative proceedings (including forfeiture, destruction, and abandonment for seized property);

(c) that Defendant obtained at least \$_____ from the criminal offenses, that the factual basis for the guilty plea supports the imposition of a money judgment in that amount, and that the Defendant agrees to the imposition of a money judgment in that amount [or, if not agreed, that the Court will determine the proper amount of a money judgment];

(d) that one or more of the conditions set forth in 21 U.S.C. § 853(p) exists, so that the forfeiture money judgment may be immediately satisfied via forfeiture of substitute property; and

(e) to the order of forfeiture becoming final as to Defendant immediately following this guilty plea or immediately following entry of the forfeiture order, whichever applies.

Financial Statement

22. Defendant agrees to truthfully complete under penalty of perjury, within thirty days of the execution of this Plea Agreement, a financial statement on a form provided by the United States Attorney's Office and to update the statement within seven days of any material change. Defendant also agrees to make full disclosure to the United States Probation Office of all current and anticipated assets in which Defendant has an interest both before sentencing and again before termination of supervised release or probation, with such disclosures to be shared with the United States Attorney's Office.

23. Defendant further agrees not to dispose or transfer any assets without the prior written permission of the United States and to authorize the release of all financial information requested by the United States, including, but not limited to, credit histories and tax returns. Defendant agrees

to discuss and answer any questions by the United States relating to Defendant's financial disclosure, including in a deposition or informal debtor exam, whether before or after sentencing.

Notification of the Sex Offender Registration and Notification Act


24. Defendant has been advised, and understands, that under the Sex Offender Registration and Notification Act, a federal law, he must register and keep the registration current in each of the following jurisdictions: where he resides; where he is an employee; and where he is a student. The Defendant understands that the requirements for registration include providing his name, his residence address and the names and addresses of any places where he is or will be an employee or a student, among other information. The Defendant further understands that the requirement to keep the registration current includes informing at least one jurisdiction in which he resides, is an employee, or is a student not later than three (3) business days after any change of residence, employment, or student status. Defendant has been advised, and understands, that failure to comply with these obligations subjects him to prosecution for failure to register under federal law, 18 U.S.C. §2250, which is punishable by a fine or imprisonment, or both.

Complete Agreement

25. This written plea agreement, consisting of 22 pages, including the attached addendum of Defendant and his/her attorney, constitutes the complete plea agreement between the United States, Defendant, and Defendant's counsel. Other than any written proffer agreement(s) that may have been entered into between the United States and Defendant, this agreement supersedes any prior understandings, promises, agreements, or conditions between the United States and Defendant. No additional understandings, promises, agreements, or conditions have been entered into other than those set forth in this agreement, and none will be entered into unless in writing

and signed by all parties. Defendant acknowledges that no threats have been made against him/her and that he/she is pleading guilty freely and voluntarily because he/she is guilty.

26. Any modification of this plea agreement must be in writing and signed by all parties.

Filed at Houston, Texas, on 6/6, 2024

Defendant


Subscribed and sworn to before me on June 7, 2024

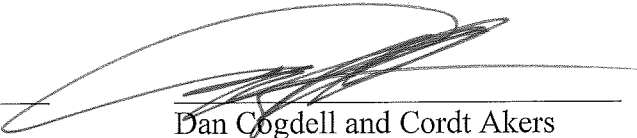
NATHAN KYLE OCHSNER
UNITED STATES DISTRICT CLERK

By: 
Deputy United States District Clerk

APPROVED:

Alamdar S. Hamdani
United States Attorney

By: 
Kimberly Ann Leo
Assistant United States Attorney
Southern District of Texas


Dan Cogdell and Cordt Akers
Attorney for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

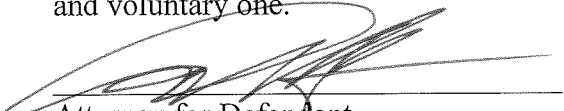
ROBERT ALEXANDER SHOUSE,
Defendant.

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CRIMINAL NO. 4:19-CR-180-S1

PLEA AGREEMENT -- ADDENDUM

I have fully explained to Defendant his/her rights with respect to the pending indictment/information. I have reviewed the provisions of the United States Sentencing Commission's Guidelines Manual and Policy Statements and I have fully and carefully explained to Defendant the provisions of those Guidelines which may apply in this case. I have also explained to Defendant that the Sentencing Guidelines are only advisory and the court may sentence Defendant up to the maximum allowed by statute per count of conviction. I have also explained to Defendant that sentences on multiple counts may be imposed to run consecutively to one another or to any other sentence. Further, I have carefully reviewed every part of this plea agreement with Defendant. To my knowledge, Defendant's decision to enter into this agreement is an informed and voluntary one.



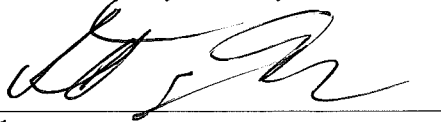
Attorney for Defendant



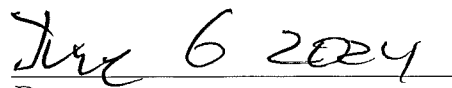
Date

I have consulted with my attorney and fully understand all my rights with respect to the indictment/information pending against me. My attorney has fully explained, and I understand, all my rights with respect to the provisions of the United States Sentencing Commission's Guidelines

Manual which may apply in my case. I have read and carefully reviewed every part of this plea agreement with my attorney. I understand this agreement and I voluntarily agree to its terms.



Defendant



Date