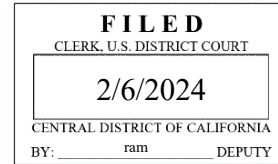


1 E. MARTIN ESTRADA
 United States Attorney
 2 MACK E. JENKINS
 Assistant United States Attorney
 3 Chief, Criminal Division
 SEAN D. PETERSON
 4 Assistant United States Attorney
 Chief, Riverside Branch Office
 5 CORY L. BURLESON (Cal. Bar No. 322239)
 Assistant United States Attorney
 6 Riverside Branch Office
 3403 Tenth Street, Suite 200
 7 Riverside, California 92501
 Telephone: (951) 276-6945
 8 Facsimile: (951) 276-6202
 Email: Cory.Burleson@usdoj.gov



9 Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

ED CR No. **5:24-cr-00041-SSS**

14 Plaintiff,

PLEA AGREEMENT FOR DEFENDANT
CAMERON JOHN FEIKEMA

15 v.

16 CAMERON JOHN FEIKEMA,

17 Defendant.

18
 19 1. This constitutes the plea agreement between CAMERON JOHN
 20 FEIKEMA ("defendant") and the United States Attorney's Office for the
 21 Central District of California (the "USAO") in the investigation of
 22 the killing of three wild burros and the unlawful possession of a
 23 short-barreled rifle. This agreement is limited to the USAO and
 24 cannot bind any other federal, state, local, or foreign prosecuting,
 25 enforcement, administrative, or regulatory authorities.

26 DEFENDANT'S OBLIGATIONS

27 2. Defendant agrees to:

28 a. Give up the right to indictment by a grand jury and,

1 at the earliest opportunity requested by the USAO and provided by the
2 Court, appear and plead guilty to counts one and two of the
3 information in the form attached to this agreement as Exhibit A or a
4 substantially similar form, which charge defendant with possession of
5 an unregistered firearm, in violation of 26 U.S.C. § 5861(d), and
6 maliciously causing, and aiding and abetting, the death of a wild
7 burro, in violation of 16 U.S.C. § 1338(a)(3) and 18 U.S.C. § 2(a).

8 b. Not contest facts agreed to in this agreement.

9 c. Abide by all agreements regarding sentencing contained
10 in this agreement.

11 d. Appear for all court appearances, surrender as ordered
12 for service of sentence, obey all conditions of any bond, and obey
13 any other ongoing court order in this matter.

14 e. Not commit any crime; however, offenses that would be
15 excluded for sentencing purposes under United States Sentencing
16 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not
17 within the scope of this agreement.

18 f. Recommend that defendant be sentenced to no less than
19 a term of probation of three years and a fine of no less than \$2,000.

20 g. Agree to and not oppose the imposition of the
21 following conditions of probation or supervised release: The
22 defendant shall submit defendant's person and any property under
23 defendant's control, including any residence or vehicle to suspicion-
24 less search and seizure at any time of the day or night by any law
25 enforcement or probation officer, with or without a warrant, and with
26 or without cause; and if stopped or questioned by a law enforcement
27 officer for any reason, defendant shall notify that officer that
28 defendant is on federal probation and subject to search.

1 h. Be truthful at all times with the United States
2 Probation and Pretrial Services Office and the Court.

3 i. Pay the applicable special assessments at or before
4 the time of sentencing.

5 3. Defendant further agrees:

6 a. To forfeit all right, title, and interest in and to
7 any and all monies, properties, and/or assets of any kind, derived
8 from or acquired as a result of, or used to facilitate the commission
9 of, or involved in the illegal activity to which defendant is
10 pleading guilty, specifically including, but not limited to, the
11 following:

12 i. One Radian, model AX556 5.56 mm caliber, AR-15
13 style short-barreled rifle, bearing serial number X01267, equipped
14 with a Bravo Company Manufacturing, Inc. upper and a folding
15 buttstock (the "BCM SBR" or the "Forfeitable Property").

16 b. To the Court's entry of an order of forfeiture at or
17 before sentencing with respect to the Forfeitable Property and to the
18 forfeiture of the assets.

19 c. That the Preliminary Order of Forfeiture shall become
20 final as to the defendant upon entry.

21 d. To take whatever steps are necessary to pass to the
22 United States clear title to the Forfeitable Property, including,
23 without limitation, the execution of a consent decree of forfeiture
24 and the completing of any other legal documents required for the
25 transfer of title to the United States.

26 e. Not to contest any administrative forfeiture
27 proceedings or civil judicial proceedings commenced against the
28 Forfeitable Property. If defendant submitted a claim and/or petition

1 for remission for all or part of the Forfeitable Property on behalf
2 of himself or any other individual or entity, defendant shall and
3 hereby does withdraw any such claims or petitions, and further agrees
4 to waive any right he may have to seek remission or mitigation of the
5 forfeiture of the Forfeitable Property. Defendant further waives any
6 and all notice requirements of 18 U.S.C. § 983(a)(1)(A) and/or
7 requirements of the Government to commence forfeiture actions
8 pursuant to 18 U.S.C. § 924(d)(1).

9 f. Not to assist any other individual in any effort
10 falsely to contest the forfeiture of the Forfeitable Property.

11 g. Not to claim that reasonable cause to seize the
12 Forfeitable Property was lacking.

13 h. To prevent the transfer, sale, destruction, or loss of
14 the Forfeitable Property to the extent defendant has the ability to
15 do so.

16 i. To fill out and deliver to the USAO a completed
17 financial statement listing defendant's assets on a form provided by
18 the USAO.

19 j. That forfeiture of Forfeitable Property shall not be
20 counted toward satisfaction of any special assessment, fine,
21 restitution, costs, or other penalty the Court may impose.

22 k. With respect to any criminal forfeiture ordered as a
23 result of this plea agreement, defendant waives: (1) the requirements
24 of Federal Rules of Criminal Procedure 32.2 and 43(a) regarding
25 notice of the forfeiture in the charging instrument, announcements of
26 the forfeiture at sentencing, and incorporation of the forfeiture in
27 the judgment; (2) all constitutional and statutory challenges to the
28 forfeiture (including by direct appeal, habeas corpus or any other

1 means); and (3) all constitutional, legal, and equitable defenses to
2 the forfeiture of the Forfeitable Property in any proceeding on any
3 grounds including, without limitation, that the forfeiture
4 constitutes an excessive fine or punishment. Defendant acknowledges
5 that the forfeiture of the Forfeitable Property is part of the
6 sentence that may be imposed in this case and waives any failure by
7 the Court to advise defendant of this, pursuant to Federal Rule of
8 Criminal Procedure 11(b)(1)(J), at the time the Court accepts
9 defendant's guilty plea.

10 1. To the abandonment to the United States of any
11 interest of the defendant in the following property, seized by law
12 enforcement on or about August 10, 2022, pursuant to search warrants:

13 i. One tan and black Smith & Wesson, M&P 9 mm
14 caliber, Performance Center pistol, bearing serial number HUS 5669,
15 with an attached Trijicon sight, bearing serial number 413902, and
16 with an attached Surefire X400V flashlight, bearing serial number
17 B05829;

18 ii. One modular night vision system, Gen 3
19 monoscope, bearing serial number C210130A;

20 iii. One set of helmet mounted infrared lights;

21 iv. One Armorworks, hard plated body armor,
22 bearing serial number AWOW 26361;

23 v. One Armorworks, hard plated body armor,
24 bearing serial number 35832;

25 vi. One tan Team Wendy, EXFIL LTP ballistic
26 helmet with helmet lights;

27 vii. Two 60-round Magpul, model PMAG D-60 GEN M3,
28 high capacity drum magazines;

1 viii. 566 rounds of an unknown brand of .223
2 Remington caliber ammunition;
3 ix. 320 rounds of Federal American Eagle .223
4 Remington caliber ammunition;
5 x. 40 rounds of Hornady 30-30 Winchester
6 caliber ammunition;
7 xi. 10 rounds of Federal 30-30 Winchester
8 caliber ammunition;
9 xii. 20 round of Perfecta .308 Winchester caliber
10 ammunition;
11 xiii. Six rounds of MC16 7.62 x 51 mm caliber
12 ammunition;
13 xiv. 13 rounds of an unknown brand of 7.62 x 51
14 mm caliber ammunition;
15 xv. 50 rounds of Freedom Munitions Pro
16 Match .223 Remington caliber ammunition;
17 xvi. 40 rounds of PMC X-Match .223 Remington
18 caliber ammunition;
19 xvii. 40 rounds of Hornady Frontier .223 Remington
20 caliber ammunition;
21 xviii. 40 rounds of Federal American Eagle .223
22 Remington caliber ammunition;
23 xix. 130 rounds of Federal Premium .308
24 Winchester caliber ammunition;
25 xx. 420 rounds of Federal Premium .308
26 Winchester caliber ammunition from three tan plastic ammunition cans;
27 xxi. 150 rounds of Hornady American Gunner 6.5 mm
28 Creedmoor caliber ammunition;

1 xxii. 100 rounds of Hornady American Gunner 6.5 mm
2 Creedmoor caliber ammunition
3 xxiii. 57 rounds of Hornady ELD/Match 6.5 mm
4 Creedmoor caliber ammunition;
5 xxiv. 178 rounds of Hornady Precision 6.5 mm
6 Creedmoor caliber ammunition;
7 xxv. 20 rounds of Remington Hog Hunter 6.5 mm
8 Creedmoor caliber ammunition;
9 xxvi. 120 rounds of Federal Gold Medal .308
10 Winchester caliber ammunition;
11 xxvii. 179 rounds of Remington Wolf .223 Remington
12 caliber ammunition;
13 xxviii. 305 rounds of TulAmmo .223 Remington caliber
14 ammunition;
15 xxix. 549 rounds of Remington L.C. .223 Remington
16 caliber ammunition;
17 xxx. 29 rounds of Remington Wolf .223 Remington
18 caliber ammunition;
19 xxxi. 90 rounds of TulAmmo .223 Remington caliber
20 ammunition;
21 xxxii. 178 rounds of Barnaul .223 Remington caliber
22 ammunition;
23 xxxiii. 118 rounds of Barnaul .223 Remington caliber
24 ammunition;
25 xxxiv. 30 rounds of Barnaul .223 Remington caliber
26 ammunition;
27 xxxv. 59 rounds of Remington Wolf .223 Remington
28 caliber ammunition; and

1 xxxvi. 30 rounds of TulAmmo .223 Remington caliber
2 ammunition (collectively, the "Seized Property").

3 m. Acknowledge that he is the sole owner of the Seized
4 Property and that no other person or entity has an interest in the
5 Seized Property.

6 n. Complete any legal documents (including, but not
7 limited to, an ATF Form 3400.1 - Abandonment) required for the
8 transfer of title of the Seized Property to the United States.

9 THE USAO'S OBLIGATIONS

10 4. The USAO agrees to:

11 a. Not contest facts agreed to in this agreement.

12 b. Abide by all agreements regarding sentencing contained
13 in this agreement.

14 c. At the time of sentencing, provided that defendant
15 demonstrates an acceptance of responsibility for the offenses up to
16 and including the time of sentencing, recommend a two-level reduction
17 in the applicable Sentencing Guidelines offense level, pursuant to
18 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an
19 additional one-level reduction if available under that section.

20 d. Provided that the offense level used by the Court is
21 15 or lower, and provided that the Court finds defendant is in
22 Criminal History Category I, recommend that defendant be sentenced to
23 a term of probation of no more than three years, to include a
24 condition of no more than six months' home detention, and a fine of
25 no more than \$2,000. In making this sentencing recommendation, the
26 United States may include aggravating information concerning
27 defendant's conduct in this case and/or his personal history and
28 characteristics to support the requested sentence, and to argue

1 against, respond to, and rebut any request or anticipated request by
2 defendant for a lower sentence.

3 NATURE OF THE OFFENSES

4 5. Defendant understands that for defendant to be guilty of
5 the crime charged in count one, that is, possession of an
6 unregistered firearm, in violation of Title 26, United States Code,
7 Section 5861(d), the following must be true:

8 a. Defendant knowingly possessed a firearm, namely a
9 short-barreled rifle;

10 b. Defendant was aware that the short-barreled rifle was
11 a rifle with a barrel of less than 16 inches in length; and

12 c. The short-barreled rifle had not been registered to
13 defendant in the National Firearms Registration and Transfer Record.

14 6. Defendant understands that for defendant to be guilty of
15 the crime charged in count two, that is, maliciously causing the
16 death of a burro, in violation of Title 16, United States Code
17 Section 1338(a)(3), the following must be true:

18 a. Defendant caused the death of a wild free-roaming
19 burro;

20 b. Defendant did so maliciously; and

21 c. The death of the burro occurred on public lands.

22 One acts "maliciously" when he or she has the intent to do the
23 prohibited act and has no justification or excuse.

24 7. Defendant understands that for defendant to be guilty of
25 aiding and abetting the crime charged in count two, that is
26 maliciously causing the death of a burro, in violation of Title 16,
27 United States Code Section 1338(a)(3) and Title 18, United States
28 Code Section 2(a), the following must be true:

1 a. Someone else maliciously caused the death of a burro;

2 b. Defendant aided, counseled, commanded, induced, or
3 procured that person with respect to at least one element of
4 maliciously causing the death of a burro;

5 c. Defendant acted with the intent to facilitate the
6 death of a burro; and

7 d. Defendant acted before the crime was completed.

8 PENALTIES

9 8. Defendant understands that the statutory maximum sentence
10 that the Court can impose for a violation of Title 26, United States
11 Code, Section 5861(d), is: 10 years' imprisonment; a 3-year period of
12 supervised release; a fine of \$10,000 or twice the gross gain or
13 gross loss resulting from the offense, whichever is greatest; and a
14 mandatory special assessment of \$100.

15 9. Defendant understands that the statutory maximum sentence
16 that the Court can impose for a violation of Title 16, United States
17 Code, Section 1338(a)(3), is: 1 year imprisonment; a fine of \$2,000;
18 and a mandatory special assessment of \$10.

19 10. Defendant understands, therefore, that the total maximum
20 sentence for all offenses to which defendant is pleading guilty is:
21 11 years imprisonment; a 3-year period of supervised release; a fine
22 of \$12,000 or twice the gross gain or gross loss resulting from the
23 offense in count one, whichever is greatest; and a mandatory special
24 assessment of \$110.

25 11. Defendant understands that supervised release is a period
26 of time following imprisonment during which defendant will be subject
27 to various restrictions and requirements. Defendant understands that
28 if defendant violates one or more of the conditions of any supervised

1 release imposed, defendant may be returned to prison for all or part
2 of the term of supervised release authorized by statute for the
3 offense that resulted in the term of supervised release, which could
4 result in defendant serving a total term of imprisonment greater than
5 the statutory maximum stated above.

6 12. Defendant understands that, by pleading guilty, defendant
7 may be giving up valuable government benefits and valuable civic
8 rights, such as the right to vote, the right to possess a firearm,
9 the right to hold office, and the right to serve on a jury.

10 Defendant understands that he is pleading guilty to a felony and that
11 it is a federal crime for a convicted felon to possess a firearm or
12 ammunition. Defendant understands that the convictions in this case
13 may also subject defendant to various other collateral consequences,
14 including but not limited to revocation of probation, parole, or
15 supervised release in another case and suspension or revocation of a
16 professional license. Defendant understands that unanticipated
17 collateral consequences will not serve as grounds to withdraw
18 defendant's guilty pleas.

19 13. Defendant understands that, if defendant is not a United
20 States citizen, the felony conviction in this case may subject
21 defendant to: removal, also known as deportation, which may, under
22 some circumstances, be mandatory; denial of citizenship; and denial
23 of admission to the United States in the future. The Court cannot,
24 and defendant's attorney also may not be able to, advise defendant
25 fully regarding the immigration consequences of the felony conviction
26 in this case. Defendant understands that unexpected immigration
27 consequences will not serve as grounds to withdraw defendant's guilty
28 pleas.

1 FACTUAL BASIS

2 14. Defendant admits that defendant is, in fact, guilty of the
3 offenses to which defendant is agreeing to plead guilty. Defendant
4 and the USAO agree to the statement of facts provided below and agree
5 that this statement of facts is sufficient to support pleas of guilty
6 to the charges described in this agreement but is not meant to be a
7 complete recitation of all facts relevant to the underlying criminal
8 conduct or all facts known to either party that relate to that
9 conduct.

10 On November 5, 2021, defendant and C.J.A. drove in C.J.A.'s
11 truck to public land managed by the Bureau of Land Management, near
12 Coyote Dry Lakebed off Fort Irwin Road, north of Yermo, California,
13 in San Bernardino County. After arriving, C.J.A. parked and both
14 C.J.A. and defendant exited the truck. In the early morning of
15 November 6, 2021, defendant and C.J.A. stood nearby C.J.A.'s truck.
16 Defendant was dressed in tactical gear, and he was wearing a
17 ballistic helmet equipped with night vision goggles and electronic
18 shooting earmuffs. Defendant also possessed a Radian, model AX556
19 5.56 mm caliber, AR-15 style firearm, bearing serial number X01267,
20 equipped with a Bravo Company Manufacturing, Inc. upper (the "BCM
21 firearm").

22 At approximately 1:00 a.m., defendant and C.J.A. fired at least
23 13 rounds from their firearms, striking and killing three wild
24 burros. Defendant fired at least four rounds from the BCM firearm,
25 as evidenced by the fact that four casings dispensed from the BCM
26 firearm were found where defendant and C.J.A. were shooting.
27 Defendant assisted C.J.A. in shooting and killing one of the burros,
28 as evidenced by the fact that a projectile removed from one of the

1 burros was fired from C.J.A.'s rifle. That burro was shot near its
2 spine towards its hind legs, which paralyzed the burro's hind legs
3 and caused it severe pain before it died. C.J.A. intentionally shot
4 at and killed the burro without justification or excuse.

5 On August 10, 2022, at his home in Yorba Linda, California,
6 defendant possessed the BCM firearm and the Seized Property described
7 above. On this day, the BCM firearm was also equipped with a folding
8 buttstock, rendering it a "rifle" as defined in 26 U.S.C. § 5845(c)
9 (the "BCM SBR"). The BCM SBR had a barrel that was 13.6 inches in
10 length. At the time defendant possessed the BCM SBR, defendant knew
11 the BCM SBR was a firearm and a rifle, and he knew that its barrel
12 was less than 16 inches long. At the time defendant possessed the
13 BCM SBR, the BCM SBR had not been registered to defendant in the
14 National Firearms Registration and Transfer Record, as required by
15 Chapter 53, Title 26, United States Code.

16 SENTENCING FACTORS

17 15. Defendant understands that in determining defendant's
18 sentence the Court is required to calculate the applicable Sentencing
19 Guidelines range and to consider that range, possible departures
20 under the Sentencing Guidelines, and the other sentencing factors set
21 forth in 18 U.S.C. § 3553(a). Defendant understands that the
22 Sentencing Guidelines are advisory only, that defendant cannot have
23 any expectation of receiving a sentence within the calculated
24 Sentencing Guidelines range, and that after considering the
25 Sentencing Guidelines and the other § 3553(a) factors, the Court will
26 be free to exercise its discretion to impose any sentence it finds
27 appropriate up to the maximum set by statute for the crimes of
28 conviction.

1 understands, however, that, defendant retains the right to be
2 represented by counsel - and if necessary, have the Court appoint
3 counsel - at every other stage of the proceeding.

4 d. The right to be presumed innocent and to have the
5 burden of proof placed on the government to prove defendant guilty
6 beyond a reasonable doubt.

7 e. The right to confront and cross-examine witnesses
8 against defendant.

9 f. The right to testify and to present evidence in
10 opposition to the charges, including the right to compel the
11 attendance of witnesses to testify.

12 g. The right not to be compelled to testify, and, if
13 defendant chose not to testify or present evidence, to have that
14 choice not be used against defendant.

15 h. Any and all rights to pursue any affirmative defenses,
16 Fourth Amendment or Fifth Amendment claims, and other pretrial
17 motions that have been filed or could be filed.

18 20. Having been fully advised by defendant's attorney regarding
19 the requirements of venue with respect to the offenses to which
20 defendant is pleading guilty, to the extent the offenses to which
21 defendant is pleading guilty were committed, begun, or completed
22 outside the Central District of California, defendant knowingly,
23 voluntarily, and intelligently waives, relinquishes, and gives up:
24 (a) any right that defendant might have to be prosecuted only in the
25 district where the offenses to which defendant is pleading guilty
26 were committed, begun, or completed; and (b) any defense, claim, or
27 argument defendant could raise or assert based upon lack of venue
28 with respect to the offenses to which defendant is pleading guilty.

1 assistance of counsel, a claim of newly discovered evidence, or an
2 explicitly retroactive change in the applicable Sentencing
3 Guidelines, sentencing statutes, or statutes of conviction.
4 Defendant understands that this waiver includes, but is not limited
5 to, arguments that the statutes to which defendant is pleading guilty
6 are unconstitutional, and any and all claims that the statement of
7 facts provided herein is insufficient to support defendant's pleas of
8 guilty.

9 24. This agreement does not affect in any way the right of the
10 USAO to appeal the sentence imposed by the Court.

11 RESULT OF WITHDRAWAL OF GUILTY PLEA

12 25. Defendant agrees that if, after entering guilty pleas
13 pursuant to this agreement, defendant seeks to withdraw and succeeds
14 in withdrawing defendant's guilty pleas on any basis other than a
15 claim and finding that entry into this plea agreement was
16 involuntary, then the USAO will be relieved of all of its obligations
17 under this agreement.

18 EFFECTIVE DATE OF AGREEMENT

19 26. This agreement is effective upon signature and execution of
20 all required certifications by defendant, defendant's counsel, and an
21 Assistant United States Attorney.

22 BREACH OF AGREEMENT

23 27. Defendant agrees that if defendant, at any time after the
24 signature of this agreement and execution of all required
25 certifications by defendant, defendant's counsel, and an Assistant
26 United States Attorney, knowingly violates or fails to perform any of
27 defendant's obligations under this agreement ("a breach"), the USAO
28 may declare this agreement breached. All of defendant's obligations

1 are material, a single breach of this agreement is sufficient for the
2 USAO to declare a breach, and defendant shall not be deemed to have
3 cured a breach without the express agreement of the USAO in writing.
4 If the USAO declares this agreement breached, and the Court finds
5 such a breach to have occurred, then: (a) if defendant has previously
6 entered guilty pleas pursuant to this agreement, defendant will not
7 be able to withdraw the guilty pleas, and (b) the USAO will be
8 relieved of all its obligations under this agreement.

9 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

10 OFFICE NOT PARTIES

11 28. Defendant understands that the Court and the United States
12 Probation and Pretrial Services Office are not parties to this
13 agreement and need not accept any of the USAO's sentencing
14 recommendations or the parties' agreements to facts or sentencing
15 factors.

16 29. Defendant understands that both defendant and the USAO are
17 free to: (a) supplement the facts by supplying relevant information
18 to the United States Probation and Pretrial Services Office and the
19 Court, (b) correct any and all factual misstatements relating to the
20 Court's Sentencing Guidelines calculations and determination of
21 sentence, and (c) argue on appeal and collateral review that the
22 Court's Sentencing Guidelines calculations and the sentence it
23 chooses to impose are not error. While this paragraph permits both
24 the USAO and defendant to submit full and complete factual
25 information to the United States Probation and Pretrial Services
26 Office and the Court, even if that factual information may be viewed
27 as inconsistent with the facts agreed to in this agreement, this
28

1 paragraph does not affect defendant's and the USAO's obligations not
2 to contest the facts agreed to in this agreement.

3 30. Defendant understands that even if the Court ignores any
4 sentencing recommendation, finds facts or reaches conclusions
5 different from those agreed to, and/or imposes any sentence up to the
6 maximum established by statute, defendant cannot, for that reason,
7 withdraw defendant's guilty pleas, and defendant will remain bound to
8 fulfill all defendant's obligations under this agreement. Defendant
9 understands that no one -- not the prosecutor, defendant's attorney,
10 or the Court -- can make a binding prediction or promise regarding
11 the sentence defendant will receive, except that it will be within
12 the statutory maximum.

13 NO ADDITIONAL AGREEMENTS

14 31. Defendant understands that, except as set forth herein,
15 there are no promises, understandings, or agreements between the USAO
16 and defendant or defendant's attorney, and that no additional
17 promise, understanding, or agreement may be entered into unless in a
18 writing signed by all parties or on the record in court.

19 ///

20 ///

21
22
23
24
25
26
27
28

PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

32. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED

UNITED STATES ATTORNEY'S OFFICE
FOR THE CENTRAL DISTRICT OF
CALIFORNIA

E. MARTIN ESTRADA
United States Attorney



02/05/2024

CORY L. BURLUSON
Assistant United States Attorney

Date



01/17/2024

CAMERON JOHN FEIKEMA
Defendant

Date



1/17/24

BRIAN GURWITZ
Attorney for Defendant
CAMERON JOHN FEIKEMA

Date

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those


1 contained in this agreement. No one has threatened or forced me in
2 any way to enter into this agreement. I am satisfied with the
3 representation of my attorney in this matter, and I am pleading
4 guilty because I am guilty of the charges and wish to take advantage
5 of the promises set forth in this agreement, and not for any other
6 reason.

7 
8 _____
9 CAMERON JOHN FEIKEMA
10 Defendant

11 _____
12 Date 01/17/2024

13 CERTIFICATION OF DEFENDANT'S ATTORNEY

14 I am CAMERON JOHN FEIKEMA's attorney. I have carefully and
15 thoroughly discussed every part of this agreement with my client.
16 Further, I have fully advised my client of his rights, of possible
17 pretrial motions that might be filed, of possible defenses that might
18 be asserted either prior to or at trial, of the sentencing factors
19 set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines
20 provisions, and of the consequences of entering into this agreement.
21 To my knowledge: no promises, inducements, or representations of any
22 kind have been made to my client other than those contained in this
23 agreement; no one has threatened or forced my client in any way to
24 enter into this agreement; my client's decision to enter into this
25 agreement is an informed and voluntary one; and the factual basis set
26 forth in this agreement is sufficient to support my client's entry of
27 guilty pleas pursuant to this agreement.

28 

BRIAN GURWITZ
Attorney for Defendant
CAMERON JOHN FEIKEMA

Date 1/17/24

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMERON JOHN FEIKEMA,

Defendant.

ED CR No.

I N F O R M A T I O N

[26 U.S.C. § 5861(d): Possession
of Unregistered Firearms;
16 U.S.C. § 1338(a)(3):
Maliciously Causing Death of
Burro; 18 U.S.C. § 924(d)(1), 26
U.S.C. §§ 5872, 7203, and
28 U.S.C. § 2461(c): Criminal
Forfeiture]

The United States Attorney charges:

COUNT ONE

[26 U.S.C. § 5861(d)]

On or about August 10, 2022, in Orange County, within the
Central District of California, defendant CAMERON JOHN FEIKEMA
knowingly possessed a firearm, namely, a Radian, model AX556 5.56 mm
caliber, AR-15 style short-barreled rifle, bearing serial number
X01267, equipped with a Bravo Company Manufacturing, Inc. upper and a
folding buttstock, with a barrel of less than 16 inches in length,
which defendant FEIKEMA knew to be a firearm and a short-barreled
rifle, as defined in Title 26, United States Code Sections 5845(a)(3)

1 and 5845(c), and which had not been registered to defendant FEIKEMA
2 in the National Firearms Registration and Transfer Record, as
3 required by Chapter 53, Title 26, United States Code.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

COUNT TWO

[16 U.S.C. § 1338(a)(3); 18 U.S.C. § 2(a)]

On or about November 6, 2021, on public land managed by the Bureau of Land Management, in San Bernardino County, within the Central District of California, defendant CAMERON JOHN FEIKEMA, aiding abetting C.J.A., maliciously caused the death of a wild free-roaming burro.

FORFEITURE ALLEGATION ONE

[26 U.S.C. §§ 5872, 7302, and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 26, United States Code, Sections 5872 and 7302, as well as Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offense set forth in Count One of this Information.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm involved in any such offense;

(b) All right, title and interest in any and all property used or intended to be used to commit any such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a) or (b).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1
2
3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 924(d)(1), and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offenses set forth in any of Counts One or Two of this
9 Information.

10 2. The defendant, if so convicted, shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any firearm or
13 ammunition involved in or used in any such offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), the
19 convicted defendant shall forfeit substitute property, up to the
20 value of the property described in the preceding paragraph if, as the
21 result of any act or omission of said defendant, the property
22 described in the preceding paragraph or any portion thereof (a)
23 cannot be located upon the exercise of due diligence; (b) has been

24 ///

25 ///

26
27
28

1 transferred, sold to, or deposited with a third party; (c) has been
2 placed beyond the jurisdiction of the court; (d) has been
3 substantially diminished in value; or (e) has been commingled with
4 other property that cannot be divided without difficulty.

5
6 E. MARTIN ESTRADA
United States Attorney

7
8
9 MACK E. JENKINS
Assistant United States Attorney
10 Chief, Criminal Division

11 SEAN D. PETERSON
Assistant United States Attorney
12 Chief, Riverside Branch Office

13 CORY L. BURLESON
Assistant United States Attorney
14 Riverside Branch Office

15 ALEXANDER SU
Assistant United States Attorney
16 Asset Forfeiture & Recovery
17 Section