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15 *Attorneys for Complainant*

16 **BEFORE THE**
17 **MEDICAL BOARD OF CALIFORNIA**
18 **DEPARTMENT OF CONSUMER AFFAIRS**
19 **STATE OF CALIFORNIA**

20 In the Matter of the Notice of Automatic
21 Revocation of License and Order:

22 **Khursheed Haider, M.D.**
23 **Mercy Medical Group**
24 **6501 Coyle Avenue**
25 **Carmichael, CA 95608**

26 **Physician's and Surgeon's Certificate**
27 **No. A 125910,**

28 Respondent.

29 Case No. 800-2023-103655

30 **NOTICE OF AUTOMATIC**
31 **REVOCATION OF LICENSE AND**
32 **ORDER**

33 [Bus. & Prof. Code, § 2232]

34 TO KHURSHEED HAIDER, M.D.:

35 YOU ARE HEREBY NOTIFIED that the Medical Board of California, Department of
36 Consumer Affairs (Board), has automatically revoked Physician's and Surgeon's Certificate
37 No. A 125910 by operation of law after having received and reviewed the record of your guilty
38 plea and subsequent conviction as described below:

39 1. On or about November 30, 2024, in *United States of America v. Khursheed Haider*,
40 Case No. 2:23-CR-00299-DC, Respondent was charged in a two-count indictment with a Count

1 One violation of Title 18 United States Code, Section 2252(a)(2), Distribution of Child
2 Pornography, and a Count Two violation of Title 18 United States Code, Section 2252(1)(4)(B),
3 Possession of Child Pornography. Both criminal counts were charged as felonies. On or about
4 June 18, 2025, pursuant to a plea agreement, Respondent pled guilty to Count One, a violation of
5 Title 18 United States Code, Section 2252(a)(2), Distribution of Child Pornography. According
6 to the plea agreement between Respondent and prosecutors, Count One carries a 5-year
7 mandatory minimum term of imprisonment and a maximum term of 20-years imprisonment.

8 2. As part of Respondent's plea, Respondent admitted to a detailed factual basis.
9 Respondent admitted that on or about October 30, 2023, he shared a 45-second long mp4 video of
10 a minor child being sexually abused by an adult male in an on-line group dedicated to sharing
11 images of child sexual abuse. Respondent admitted he was aware that the child depicted in the
12 video was a minor and that Respondent knowingly distributed the video. In addition, Respondent
13 admitted that he also shared additional videos and content that showed sexual abuse of other
14 minor children and babies. According to the factual basis, the Federal Bureau of Investigation
15 conducted a forensic review of Respondent's electronic devices and found more than 600 images
16 and videos of child sexual abuse material. Respondent signed the factual basis on June 18, 2025,
17 and acknowledged that the contents of the factual basis was accurate.

18 3. As part of his plea agreement, Respondent acknowledged that he will be required by
19 law to register as a sex offender with both the Federal Government and the State of California.
20 Respondent also agreed as part of his plea agreement that he waives his right to appeal and
21 collaterally attack his guilty plea, conviction, and sentence. Following the entry of his guilty plea,
22 the Federal Court set Respondent's sentencing for September 26, 2025.

23 4. Respondent is currently in the custody of the United States Marshall's Service.

24 5. The following documents support these findings, are attached hereto, and are
25 incorporated herein by reference:

26 Attachment A: Change of Plea and Factual Basis filed in Federal Court;

27 Attachment B: Schedule of Disclosures and Sentencing Date in Federal
28 Court; and,

1 Attachment C: Court's Minute Order from the Change of Plea in Federal Court.

2 **CONVICTION AND SEX OFFENDER REGISTRATION: AUTOMATIC REVOCATION**

3 6. Section 2232 of the Code states, in pertinent part:

4 (a)(1) Except as provided in subdivision (c), the board shall automatically revoke a
5 license under either of the following circumstances:

6 (A) The licensee, at any time after January 1, 1947, has been convicted in any court in
7 or outside of this state of any offense that, if committed or attempted in this state, based on
8 the elements of the convicted offense, would have been punishable as one or more of the
offenses described in subdivision (c) of Section 290 of the Penal Code.

9 (B) The licensee, at any time after January 1, 1947, has been required to register as a
10 sex offender pursuant to the provisions of Section 290 of the Penal Code, regardless of
whether the related conviction has been appealed.

11 (2) The board shall notify the licensee of the license revocation and of their right to
12 elect to have a hearing as provided in subdivision (b).

13 (b) Upon revocation of the physician's and surgeon's certificate, the holder of the
14 certificate may request a hearing within 30 days of the revocation. The proceeding shall be
15 conducted in accordance with the Administrative Procedure Act (Chapter 5 (commencing
with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code).

16 (c) This section shall not apply to a person who is required to register as a sex
17 offender pursuant to Section 290 of the Penal Code solely because of a misdemeanor
conviction under Section 314 of the Penal Code.

18 (d) A plea or verdict of guilty or a conviction after a plea of nolo contendere is
19 deemed to be a conviction within the meaning of this section. The record of conviction shall
be conclusive evidence of the fact that the conviction occurred.

20 (e) If the related conviction of the certificate holder is overturned on appeal, the
21 revocation ordered pursuant to this section shall automatically cease. Nothing in this
22 subdivision shall prohibit the board from pursuing disciplinary action based on any cause
other than the overturned conviction.

23 (f) The other provisions of this article setting forth a procedure for the revocation of a
24 physician's and surgeon's certificate shall not apply to proceedings conducted pursuant to
this section.

25
26 WHEREFORE, THE MEDICAL BOARD OF CALIFORNIA, DEPARTMENT OF
27 CONSUMER AFFAIRS, HEREBY NOTIFIES YOU THAT, by virtue of said conviction and the
28 lifetime requirement to register as a sex offender, Physician's and Surgeon's Certificate No. A

1 125910 issued to Khursheed Haider, M.D., was automatically revoked by operation of law,
2 effective June 18, 2025, pursuant to Business and Professions Code section 2232. Respondent
3 shall cause to be delivered to the Board both his wall and pocket license certificate within 15 days
4 from the date of the service of this order.

5 **YOU ARE FURTHER NOTIFIED THAT** you have a right to a hearing on the issue of
6 revocation, as provided by Business and Professions Code section 2232, subdivision (b), as set
7 forth above. A request for a hearing may be made by delivering or mailing such a request to:
8 John S. Gatschet, Deputy Attorney General, Department of Justice, Office of the Attorney
9 General, 1300 I Street, Suite 125, Sacramento, CA 94244-2550. You must file your request for a
10 hearing within 30 days of the filing and service of this Order. This notice is being served upon
11 Respondent at his address of record and on Respondent's criminal defense attorney: Mark
12 Reichel, Law Office of Mark Reichel, 455 Capitol Mall Unit 802, Sacramento, CA 95814

13 **IT IS SO ORDERED**

14
15 DATED: JUL 02 2025

16 *Sharlene Smith* For
17 REJI VARGHESE
18 Executive Director
19 Medical Board of California
20 Department of Consumer Affairs
21 State of California
22 *Complainant*

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ATTACHMENT A
Change of Plea and Factual Basis filed in Federal Court

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2 Acting United States Attorney
3 ALEXIS KLEIN
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
6 Sacramento, CA 95814
7 Telephone: (916) 554-2700
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9
10 Attorneys for Plaintiff
11 United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

I. INTRODUCTION

A. Scope of Agreement.

19 The Indictment in this case charges the defendant with a violation of 18 U.S.C. § 2252(a)(2) –
20 Distribution of Child Pornography (Count One) and a violation of 18 U.S.C. § 2252(a)(4)(B) –
21 Possession of Child Pornography (Count Two). This document contains the complete plea agreement
22 between the United States Attorney’s Office for the Eastern District of California (the “government”)
23 and the defendant regarding this case. This plea agreement is limited to the United States Attorney’s
24 Office for the Eastern District of California and cannot bind any other federal, state, or local
25 prosecuting, administrative, or regulatory authorities.

B. Court Not a Party.

27 The Court is not a party to this plea agreement. Sentencing is a matter solely within the
28 discretion of the Court, and the Court may take into consideration any and all facts and circumstances

1 concerning the criminal activities of defendant, including activities which may not have been charged in
2 the Indictment. The Court is under no obligation to accept any recommendations made by the
3 government, and the Court may in its discretion impose any sentence it deems appropriate up to and
4 including the statutory maximum stated in this plea agreement.

If the Court should impose any sentence up to the maximum established by the statute, the defendant cannot, for that reason alone, withdraw defendant's guilty plea, and he will remain bound to fulfill all of the obligations under this plea agreement. The defendant understands that neither the prosecutor, defense counsel, nor the Court can make a binding prediction or promise regarding the sentence he will receive.

II. DEFENDANT'S OBLIGATIONS

A. Guilty Plea.

12 The defendant will plead guilty to Count One, Distribution of Child Pornography, in violation of
13 18 U.S.C. § 2252(a)(2). The defendant agrees that he is in fact guilty of this crime and that the facts set
14 forth in the Factual Basis for Plea attached hereto as Exhibit A are accurate.

15 The defendant agrees that this plea agreement will be filed with the Court and become a part of
16 the record of the case. The defendant understands and agrees that he will not be allowed to withdraw his
17 plea should the Court not follow the government's sentencing recommendations.

18 The defendant agrees that the statements made by him in signing this Agreement, including the
19 factual admissions set forth in the factual basis, shall be admissible and useable against the defendant by
20 the United States in any subsequent criminal or civil proceedings, even if the defendant fails to enter a
21 guilty plea pursuant to this Agreement. The defendant waives any rights under Fed. R. Crim. P. 11(f)
22 and Fed. R. Evid. 410, to the extent that these rules are inconsistent with this paragraph or with this
23 Agreement generally.

1. Custodial Status.

25 The defendant acknowledges that the crime to which he is pleading guilty is listed in 18 U.S.C. §
26 3143(a)(2), and the defendant agrees that he will remain in custody upon the entry of his plea.

B. Sentencing Recommendation.

28 Count One carries a 5-year mandatory minimum sentence of imprisonment. The defendant and

1 his counsel may recommend any custodial sentence they deem appropriate but no less than the
2 mandatory statutory minimum (meaning a sentence of imprisonment of 5 years or more). The defendant
3 and his counsel will further recommend a term of supervised release of at least 10 years (with conditions
4 set by the Court), a mandatory special assessment of \$5,100, as set forth in 18 U.S.C. §§ 3013 and 3014,
5 restitution as determined by the Court, forfeiture of the items in section II.G., a fine as determined by the
6 Court, and registration as a sex offender.

7 C. Restitution.

8 The defendant agrees the conduct to which he is pleading guilty requires him to pay mandatory
9 restitution to the victim(s) of his crimes under 18 U.S.C. § 2259. The defendant agrees to pay restitution
10 to the victims of his crimes for the total loss as a result of the conduct. The defendant understands the
11 compensable losses may range from \$1,000 up to \$100,000. The defendant understands the amount of
12 restitution will be determined by the Court. Restitution payments shall be by cashier's or certified check
13 made payable to the Clerk of the Court.

14 Further, pursuant to 18 U.S.C. § 3663(a)(1) or (3663(a)(3), the defendant agrees to pay
15 restitution to any of his minor victims, for the entire scope of his criminal conduct, including but not
16 limited to all matters included as relevant conduct. The defendant acknowledges and agrees that this
17 criminal conduct (or relevant conduct) includes any minor victim of any Chapter 110 offenses, charged
18 or uncharged, and any minor victim of any violation of federal and/or state law committed by the
19 defendant, including any contact sexual offense. The defendant agrees to pay between \$3,000 and
20 \$35,000 per victim if the victim submits a sufficient restitution claim.

21 Further, pursuant to 18 U.S.C. § 3664(d)(5), the defendant agrees not to oppose bifurcation of the
22 sentencing hearing if any of the victims' losses are not ascertainable prior to sentencing.

23 Defendant agrees that all criminal monetary penalties imposed by the court, including restitution,
24 will be due in full immediately at time of sentencing and subject to immediate enforcement by the
25 government. Defendant agrees that any payment schedule or plan set by the court is merely a minimum
26 and does not foreclose the United States from collecting all criminal monetary penalties at any time
27 through all available means.

28 Defendant further agrees that he will not seek to discharge any restitution obligation or any part

1 of such obligation in any bankruptcy proceeding.

2 Defendant shall not sell, encumber, transfer, convey, or otherwise dispose of any of his assets
3 without prior written consent of the United States Attorney, except that the defendant may sell, transfer
4 or convey personal property (including used vehicles and personal items, but not financial instruments,
5 ownership interests in business entities or real property) with an aggregate value of less than \$5,000.

6 Payment of restitution shall be by cashier's or certified check made payable to the Clerk of the
7 Court.

8 **D. Fine.**

9 The defendant reserves the right to argue to Probation and at sentencing that he is unable to pay a
10 fine, and that no fine should be imposed. The defendant understands that it is defendant's burden to
11 affirmatively prove that he is unable to pay a fine, and agrees to provide a financial statement under
12 penalty of perjury to the Probation Officer and the government in advance of the issuance of the draft
13 Presentence Investigation Report, along with supporting documentation. The government retains the
14 right to oppose the waiver of a fine. If the Court imposes a fine, the defendant agrees to pay such fine if
15 and as ordered by the Court, up to the statutory maximum fine for the defendant's offense.

16 **E. Special Assessment.**

17 The defendant agrees to pay a special assessment as ordered by the Court at the time of
18 sentencing by delivering a check or money order payable to the United States District Court to the
19 United States Probation Office immediately before the sentencing hearing. The defendant agrees that
20 this special assessment will include:

- 21 1. A mandatory special assessment of \$100 under 18 U.S.C. § 3013; and
- 22 2. A mandatory special assessment of \$5,000 under 18 U.S.C. § 3014 because the defendant
23 agrees that he is a non-indigent person for purposes of 18 U.S.C. § 3014.
- 24 3. A discretionary special assessment of up to \$35,000 under 18 U.S.C. § 2259A.

25 **F. Violation of Plea Agreement by Defendant/Withdrawal of Plea.**

26 If the defendant violates this plea agreement in any way, withdraws defendant's plea, or tries to
27 withdraw defendant's plea, this plea agreement is voidable at the option of the government. If the
28 government elects to void the agreement based on the defendant's violation, the government will no

1 longer be bound by its representations to the defendant concerning the limits on criminal prosecution
2 and sentencing as set forth herein. A defendant violates the plea agreement by committing any crime or
3 providing or procuring any statement or testimony which is knowingly false, misleading, or materially
4 incomplete in any litigation or sentencing process in this case, or engages in any post-plea conduct
5 constituting obstruction of justice. The government also shall have the right (1) to prosecute the
6 defendant on any of the counts to which he pleaded guilty; (2) to reinstate any counts that may be
7 dismissed pursuant to this plea agreement; and (3) to file any new charges that would otherwise be
8 barred by this plea agreement. The defendant shall thereafter be subject to prosecution for any federal
9 criminal violation of which the government has knowledge. The decision to pursue any or all of these
10 options is solely in the discretion of the United States Attorney's Office.

11 By signing this plea agreement, the defendant agrees to waive any objections, motions, and
12 defenses that the defendant might have to the government's decision. Any prosecutions that are not
13 time-barred by the applicable statute of limitations as of the date of this plea agreement may be
14 commenced in accordance with this paragraph, notwithstanding the expiration of the statute of
15 limitations between the signing of this plea agreement and the commencement of any such prosecutions.
16 The defendant agrees not to raise any objections based on the passage of time with respect to such
17 counts including, but not limited to, any statutes of limitation or any objections based on the Speedy
18 Trial Act or the Speedy Trial Clause of the Sixth Amendment to any counts that were not time-barred as
19 of the date of this plea agreement.

20 In addition, (1) all statements made by the defendant to the government or other designated law
21 enforcement agents, or any testimony given by the defendant before a grand jury or other tribunal,
22 whether before or after this plea agreement, shall be admissible in evidence in any criminal, civil, or
23 administrative proceedings hereafter brought against the defendant; and (2) the defendant shall assert no
24 claim under the United States Constitution, any statute, Rule 11(f) of the Federal Rules of Criminal
25 Procedure, Rule 410 of the Federal Rules of Evidence, or any other federal rule, that statements made by
26 the defendant before or after this plea agreement, or any leads derived therefrom, should be suppressed.
27 By signing this plea agreement, the defendant waives any and all rights in the foregoing respects.

28 ///

1 **G. Forfeiture.**

2 The defendant agrees to forfeit to the United States voluntarily and immediately all of his right,
3 title, and interest to any and all assets subject to forfeiture pursuant to 18 U.S.C. § 2253(a). Those assets
4 include, but are not limited to, the following:

5 1. iPhone 12 Pro Max, IMEI 357014748230984, Serial Number F2LFXNW60D46,
6 and
7 2. Apple MacBook Pro laptop, Serial Number C02VT1E5HV2M.

8 The defendant agrees that the listed assets were used to commit and to promote the commission
9 of a violation of 18 U.S.C. § 2252(a).

10 The defendant agrees to fully assist the government in the forfeiture of the listed assets and to
11 take whatever steps are necessary to pass clear title to the United States. The defendant shall not sell,
12 transfer, convey, or otherwise dispose of any of his assets, including but not limited to, the above-listed
assets.

13 The defendant agrees not to file a claim to any of the listed property in any civil proceeding,
14 administrative or judicial, which may be initiated. The defendant agrees to waive his right to notice of
15 any forfeiture proceeding involving this property, and agrees to not file a claim or assist others in filing a
16 claim in that forfeiture proceeding.

17 The defendant knowingly and voluntarily waives his right to a jury trial on the forfeiture of
18 assets, and all constitutional, legal and equitable defenses to the forfeiture of these assets in any
19 proceeding. The defendant agrees to waive any jeopardy defense and agrees to waive any claim or
20 defense under the Eighth Amendment to the United States Constitution, including any claim of
21 excessive fine, to the forfeiture of the assets by the United States. The defendant waives oral
22 pronouncement of forfeiture at the time of sentencing, and any defenses or defects that may pertain to
23 the forfeiture.

24 **H. Asset Disclosure.**

25 The defendant agrees to make a full and complete disclosure of defendant's assets and financial
26 condition, and will complete the United States Attorney's Office's "Authorization to Release
27 Information" and "Financial Disclosure Statement" within three (3) weeks from the entry of the
28 defendant's change of plea, including supporting documentation. The defendant also agrees to have the

1 Court enter an order to that effect. The defendant understands that if he fails to complete truthfully and
2 provide the described documentation to the United States Attorney's Office within the allotted time, he
3 will be considered in violation of the agreement, and the government shall be entitled to the remedies set
4 forth in section II.F above.

5 Defendant expressly authorizes the United States to immediately obtain a credit report to
6 evaluate defendant's ability to satisfy any monetary penalty imposed by the court. Defendant also
7 authorizes the U.S. Attorney's Office to inspect and copy all financial documents and information held
8 by the U.S. Probation Office.

III. THE GOVERNMENT'S OBLIGATIONS

A. Dismissals/Other Charges.

11 The government agrees to move, at the time of sentencing, to dismiss without prejudice the
12 remaining counts in the pending Indictment, and agrees not to bring any other charges arising from the
13 conduct outlined in the Factual Basis attached hereto as Exhibit A. The government also agrees not to
14 reinstate any dismissed count except if this agreement is voided as set forth herein, or as provided in the
15 following sections: Violation of Plea Agreement by Defendant/Withdrawal of Plea; and Waiver of
16 Appeal and Collateral Attack herein.

B. Recommendations.

1. Sentencing Recommendation.

19 The government will recommend a sentence of imprisonment at or below the mid-range of the
20 guidelines range as calculated by the Court, plus a 10-year term of supervised release (with conditions
21 set by the Court), a mandatory special assessment of \$5,100, as set forth in 18 U.S.C. §§ 3013 and 3014,
22 restitution as determined by the Court to victims, forfeiture of the items in section II.G., a fine as
23 determined by the Court, and registration as a sex offender.

2. Acceptance of Responsibility.

25 The government will recommend a two-level reduction (if the offense level is less than 16) or a
26 three-level reduction (if the offense level reaches 16) in the computation of defendant's offense level if
27 the defendant clearly demonstrates acceptance of responsibility for defendant's conduct as defined in
28 U.S.S.G. § 3E1.1. This includes the defendant meeting with and assisting the probation officer in the

1 preparation of the pre-sentence report, being truthful and candid with the probation officer, and not
2 otherwise engaging in conduct that constitutes obstruction of justice within the meaning of U.S.S.G. §
3 3C1.1, either in the preparation of the pre-sentence report or during the sentencing proceeding.

4 **C. Use of Information for Sentencing.**

5 The government is free to provide full and accurate information to the Court and Probation,
6 including Victim Impact Statements, and answering any inquiries made by the Court and/or Probation
7 and rebutting any inaccurate statements or arguments by the defendant, defendant's attorney, Probation,
8 or the Court. The defendant also understands and agrees that nothing in this Plea Agreement bars the
9 government from defending on appeal or collateral review any sentence that the Court may impose.

10 **IV. ELEMENTS OF THE OFFENSE**

11 At a trial, the government would have to prove beyond a reasonable doubt the following
12 elements of the offense to which the defendant is pleading guilty, 18 U.S.C. § 2252(a)(2) – Distribution
13 of Child Pornography (Count One) (adapted from Ninth Circuit Model Jury Instruction 20.22):

- 14 1. The defendant knowingly distributed a visual depiction using any means or
15 facility of interstate or foreign commerce, that had been shipped and transported in and
affecting interstate and foreign commerce, or which contained materials that had been
mailed and so shipped and transported by any means, including by computer;
- 16 2. The production of such visual depiction involved the use of a minor engaging in
17 sexually explicit conduct (actual or simulated);
- 18 3. Such visual depiction was of a minor engaged in sexually explicit conduct;
- 19 4. The defendant knew that such a visual depiction was of sexually explicit conduct;
20 and
- 21 5. The defendant knew that at least one of the persons engaging in sexually explicit
conduct in such visual depiction was a minor.

22 The defendant fully understands the nature and elements of the crime charged in the Indictment
23 to which he is pleading guilty, together with the possible defenses thereto, and has discussed them with
24 defendant's attorney.

25 **V. MAXIMUM SENTENCE**

26 **A. Maximum Penalty.**

27 The maximum sentence that the Court can impose on Count One of the Indictment is 20 years in
28 prison, with a mandatory minimum sentence of 5 years, a fine of \$250,000, a term of supervised release

1 of at least 5 years up to life, an assessment under the AVAA of \$35,000, and a special assessment of
2 \$5,100. By signing this plea agreement, the defendant also agrees that the Court will order the payment
3 of restitution for the full loss caused by the defendant's wrongful conduct. The defendant agrees that the
4 restitution order is not restricted to the amounts alleged in the specific count to which he is pleading
5 guilty. The defendant further agrees, as noted above, that he will not attempt to discharge in any present
6 or future bankruptcy proceeding any restitution imposed by the Court.

7 **B. Violations of Supervised Release.**

8 The defendant understands that if he violates a condition of supervised release at any time during
9 the term of supervised release, the Court may revoke the term of supervised release. In certain
10 circumstances, when a person is required to register as a sex offender and then commits certain other
11 federal sex offenses, the court may revoke the supervised release and impose a prison sentence of at
12 least 5 years. 18 U.S.C. § 3583(k). The Supreme Court has held (*United States v. Haymond*, 139 S. Ct.
13 2369 (2019)) that such a revocation requires a finding by a jury, however, not by a judge.

14 **VI. SENTENCING DETERMINATION**

15 **A. Statutory Authority.**

16 The defendant understands that the Court must consult the Federal Sentencing Guidelines and
17 must take them into account when determining a final sentence. The defendant understands that the
18 Court will determine a non-binding and advisory guideline sentencing range for this case pursuant to the
19 Sentencing Guidelines and must take them into account when determining a final sentence. The
20 defendant further understands that the Court will consider whether there is a basis for departure from the
21 guideline sentencing range (either above or below the guideline sentencing range) because there exists
22 an aggravating or mitigating circumstance of a kind, or to a degree, not adequately taken into
23 consideration by the Sentencing Commission in formulating the Guidelines. The defendant further
24 understands that the Court, after consultation and consideration of the Sentencing Guidelines, must
25 impose a sentence that is reasonable in light of the factors set forth in 18 U.S.C. § 3553(a).

26 **B. Estimated Guideline Calculation.**

27 The government and the defendant agree that the following is their present best estimate of the
28 sentencing guidelines variables. These estimates shall not be binding on the Court, the Probation Office,

1 or the parties:

2. Base Offense Level: 22 (§ 2G2.2(a)(2))
3. Specific Offense Characteristics:
 4. a. + 2 (2G2.2(b)(2) – minor under 12)
 5. b. + 2 (2G2.2(b)(3)(F) – distribution)
 6. c. + 4 (2G2.2(b)(4) – both sadistic and infant/toddler)
 7. d. + 2 (2G2.2(b)(6) – use of computer)
 8. e. + 5 (2G2.1(b)(7)(D) – 600+ images)
9. Acceptance of Responsibility: – 3 (*if III.B.2. is satisfied*)
10. Adjusted Offense Level: 34
11. Criminal History: The parties estimate, but do not stipulate, that the defendant's criminal history category will be I.
12. Sentencing Range: 151-188 months
 13. a. The defendant understands that if the criminal history category or the guidelines provisions as calculated by the Court differ from the parties' estimates, defendant's Guidelines sentencing range may differ from that set forth here.

16 Both parties agree not to move for, or argue in support of, any departure from the Sentencing
17 Guidelines. The defendant reserves the right to argue for a variance from the Guidelines range
18 determined by the Court based on the factors set forth in 18 U.S.C. § 3553(a), but only down to the
19 statutory minimum sentence of 5 years. The government reserves the right to argue against any
20 variance.

21 **VII. WAIVERS**

22 **A. Waiver of Constitutional Rights.**

23 The defendant understands that by pleading guilty he is waiving the following constitutional
24 rights: (a) to plead not guilty and to persist in that plea if already made; (b) to be tried by a jury; (c) to
25 be assisted at trial by an attorney, who would be appointed if necessary; (d) to pursue any affirmative
26 defenses, Fourth Amendment or Fifth Amendment claims, constitutional challenges to the statutes of
27 conviction, and other pretrial motions that have been filed or could be filed; (e) to subpoena witnesses to
28 testify on defendant's behalf; (f) to confront and cross-examine witnesses against him; and (g) not to be

1 compelled to incriminate himself.

2 **B. Waiver of Appeal and Collateral Attack.**

3 The defendant understands that the law gives the defendant a right to appeal defendant's guilty
4 plea, conviction, and sentence. The defendant agrees as part of defendant's plea, however, to give up
5 the right to appeal the guilty plea, conviction, and the sentence imposed. The defendant understands that
6 this waiver includes, but is not limited to, any and all constitutional and/or legal challenges to the
7 defendant's conviction and guilty plea, including arguments that the statutes to which defendant is
8 pleading guilty are unconstitutional, and any and all claims that the statement of facts attached to this
9 agreement is insufficient to support the defendant's plea of guilty. The defendant specifically gives up
10 the right to appeal any order of restitution the Court may impose.

11 Notwithstanding the defendant's waiver of appeal, the defendant will retain the right to appeal if
12 one of the following circumstances occurs: (1) the sentence imposed by the District Court exceeds the
13 statutory maximum; and/or (2) the government appeals the sentence in the case. The defendant
14 understands that these circumstances occur infrequently and that in almost all cases this Agreement
15 constitutes a complete waiver of all appellate rights.

16 In addition, regardless of the sentence the defendant receives, the defendant also gives up any
17 right to bring a collateral attack, including a motion under 28 U.S.C. § 2255 or § 2241, challenging any
18 aspect of the guilty plea, conviction, or sentence, except for non-waivable claims.

19 Notwithstanding the government's agreements in paragraph III.A above, if the defendant ever
20 attempts to vacate defendant's plea, dismiss the underlying charges, or modify or set aside defendant's
21 sentence on any of the counts to which he is pleading guilty, the government shall have the rights set
22 forth in Section II.F. herein.

23 **C. Waiver of Attorneys' Fees and Costs.**

24 The defendant agrees to waive all rights under the "Hyde Amendment," Section 617, P.L. 105-
25 119 (Nov. 26, 1997), to recover attorneys' fees or other litigation expenses in connection with the
26 investigation and prosecution of all charges in the above-captioned matter and of any related allegations
27 (including without limitation any charges to be dismissed pursuant to this plea agreement and any
28 charges previously dismissed).

1 **D. Impact of Plea on Defendant's Immigration Status.**

2 Defendant recognizes that pleading guilty may have consequences with respect to defendant's
3 immigration status if he is not a citizen of the United States or is a naturalized citizen. Under federal
4 law, a broad range of crimes are removable offenses, including offense(s) to which the defendant is
5 pleading guilty. The defendant and defendant's counsel have discussed the fact that the charge to which
6 the defendant is pleading guilty is an aggravated felony, or a crime that is likely to be determined to be
7 an aggravated felony under 8 U.S.C. § 1101(a)(43), and that while there may be arguments that
8 defendant can raise in immigration proceedings to avoid or delay removal, it is virtually certain that
9 defendant will be removed. Removal and other immigration consequences are the subject of a separate
10 proceeding, however, and defendant understands that no one, including defendant's attorney or the
11 district court, can predict to a certainty the effect of defendant's conviction on defendant's immigration
12 status. Defendant nevertheless affirms that he wants to plead guilty regardless of any immigration
13 consequences that defendant's plea may entail, even if the consequence is defendant's automatic
14 removal from the United States.

15 **E. Sex Offender Registration.**

16 Defendant understands that by pleading guilty, defendant will be required to register as a sex
17 offender upon defendant's release from prison as a condition of supervised release pursuant to 18 U.S.C.
18 § 3583(d). Defendant also understands that independent of supervised release, he will be subject to
19 federal and state sex offender registration requirements, and that those requirements may apply
20 throughout defendant's life. The defendant understands that he shall keep defendant's registration
21 current, shall notify the state sex offender registration agency or agencies of any changes to defendant's
22 name, place of residence, employment, or student status, or other relevant information. Defendant shall
23 comply with requirements to periodically verify in person defendant's sex offender registration
24 information. Defendant understands that he will be subject to possible federal and state penalties for
25 failure to comply with any such sex offender registration requirements. If he resides in California
26 following release from prison, he will be subject to the registration requirements of Penal Code § 290.
27 Defendant further understands that, under 18 U.S.C. § 4042(c), notice will be provided to certain law
28 enforcement agencies upon defendant's release from confinement following conviction. As a condition

1 of supervised release, defendant shall initially register with the state sex offender registration in
2 California, and shall also register with the state sex offender registration agency in any state where
3 defendant resides, is employed, works, or is a student, as directed by the Probation Officer. The
4 defendant shall comply with all requirements of federal and state sex offender registration laws,
5 including the requirement to update defendant's registration information. Defendant shall provide proof
6 of registration to the Probation Officer within 72 hours of release from imprisonment.

7 **VIII. ENTIRE PLEA AGREEMENT**

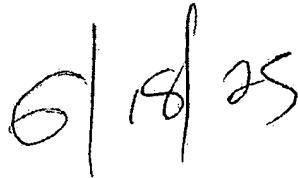
8 Other than this plea agreement, no agreement, understanding, promise, or condition between the
9 government and the defendant exists, nor will such agreement, understanding, promise, or condition
10 exist unless it is committed to writing and signed by the defendant, counsel for the defendant, and
11 counsel for the United States.

12 **IX. APPROVALS AND SIGNATURES**

13 **A. Defense Counsel.**

14 I have read this plea agreement and have discussed it fully with my client. The plea agreement
15 accurately and completely sets forth the entirety of the agreement. I concur in my client's decision to
16 plead guilty as set forth in this plea agreement.

17 Dated:

18 
19 6/18/25

20 
21 MARK REICHEL
22 Attorney for Defendant Khursheed Haider

23 **B. Defendant:**

24 I have read this plea agreement and carefully reviewed every part of it with my attorney. I
25 understand it, and I voluntarily agree to it. Further, I have consulted with my attorney and fully
26 understand my rights with respect to the provisions of the Sentencing Guidelines that may apply to my
27 case. No other promises or inducements have been made to me, other than those contained in this plea
28 agreement. In addition, no one has threatened or forced me in any way to enter into this plea agreement.

29 ///

30 ///

1 Finally, I am satisfied with the representation of my attorney in this case.

2

3 Dated:

4 *6/18/25*

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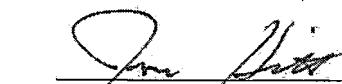
KHURSHEED HAIDER
Defendant

C. **Attorney for United States:**

I accept and agree to this plea agreement on behalf of the government.

Dated: *June 18, 2025*

MICHELE BECKWITH
Acting United States Attorney


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ALEXIS KLEIN *Jason Hitt*
Assistant United States Attorney

EXHIBIT "A"

Factual Basis for Plea

If this matter proceeded to trial, the United States would establish the following facts beyond a reasonable doubt:

On or about October 30, 2023, the defendant, Khursheed Haider, within the Eastern District of California, used the internet, an internet-based application, and an Apple iPhone and/or laptop to knowingly distribute one or more visual depictions of a minor engaging in sexually explicit conduct, knowing this material showed a minor engaging in sexually explicit conduct.

9 The defendant was a member of a number of on-line groups dedicated to sharing information,
10 images, and/or videos of child sexual abuse for sexual gratification. On or about October 30, 2023, the
11 defendant, using the internet and an internet-based application, posted an mp4 video in one of these
12 groups that was approximately 45 seconds long. This video depicted a pre-pubescent boy being sexually
13 abused by an adult male and included acts of digital penetration and masturbation. The defendant
14 separately maintained copies of this video, bearing the same file name, on his iPhone and laptop. This
15 video was a visual depiction that involved the use of a minor and was of a minor engaged in sexually
16 explicit conduct. The defendant knew this, and knew the pre-pubescent child depicted in the video was
17 undisputedly a minor.

18 The defendant also used the same internet-based application to post, receive, and discuss other
19 videos and content depicting the sexual abuse of babies and children, including videos depicting
20 physical torture and rape, babies and children crying and squirming in pain as they are being sexually
21 abused, beastiality, and BDSM.

22 The Federal Bureau of Investigation conducted forensic reviews of digital devices that were
23 seized pursuant to search warrants executed in this case. Agents located more than 600 images and
24 videos of child sexual abuse material during their review.

25 I have reviewed the "Factual Basis" information above with my attorney, and agree that it is
26 accurate. *[Signature]*

27 | Dated: 6/18/95


KHURSHEED HAIDER, Defendant

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ATTACHMENT B

Schedule of Disclosures and Sentencing Date in Federal Court

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KHURSHEED HAIDER,

Defendant.

CASE NO. 2:23-CR-00299-DC

SCHEDULE FOR DISCLOSURE OF PRE-SENTENCE REPORT AND FOR FILING OF OBJECTIONS TO THE PRE-SENTENCE REPORT

The Probation Officer and all parties shall adhere to this schedule unless it is later modified by this Court.

Date of referral to Probation Officer: **6/18/2025**

Judgment and sentencing date: **9/26/2025**

Reply or statement of non-opposition: **9/19/2025**

Motion for correction of the Pre-Sentence Report shall be filed with the court and served on the Probation Officer and opposing counsel no later than: **9/12/2025**

The Pre-Sentence Report shall be filed with the Court and disclosed to counsel no later than: **9/5/2025**

Counsel's written objections to the Pre-Sentence Report shall be delivered to the Probation Officer and opposing counsel no later than: **8/29/2025**

The Proposed Pre-Sentence Report shall be disclosed to counsel no later than: **8/15/2025**

Dated: June 18, 2025

By: /s/ C. Schultz
COURTROOM CLERK

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ATTACHMENT C
Court's Minute Order from the Change of Plea in Federal Court

Document:

2:23cr299, USA v. Haider

				Maryann Valenoti. (Text Only Entry) (Deputy Clerk CRS) (Entered: 02/21/2025)	
<input type="checkbox"/>	<u>Online</u>	52	04/10/2025	(DISREGARD; REFER TO AMENDED FILING AT DOC. NO. 53) STIPULATION and PROPOSED ORDER Continuing status conference, (Reichel, Mark) (Docket Text Modified on 4/11/2025 by CRS.) (Entered: 04/10/2025)	
<input type="checkbox"/>	<u>Online</u>	53	04/10/2025	(DISREGARD; REFER TO AMENDED FILING AT DOC. NO. 54) STIPULATION and PROPOSED ORDER to Continue Status Conference and Exclude Time by USA. (Klein, Alexis) (Docket Text Modified on 4/11/2025 by CRS.) (Entered: 04/10/2025)	
<input type="checkbox"/>	<u>Online</u>	54	04/11/2025	AMENDED STIPULATION and PROPOSED ORDER to Continue Status Conference and Exclude Time filed by USA. (Klein, Alexis) (Docket Text Modified on 4/11/2025 by CRS.) (Entered: 04/11/2025)	
<input type="checkbox"/>	<u>Online</u>	55	04/14/2025	AMENDED STIPULATION and ORDER as to Khursheed Haider signed by District Judge Dena M. Coggins on 4/11/2025 RESETTING the Status Conference to 5/2/2025 at 9:30 AM in Courtroom 8 (DC) before District Judge Dena M. Coggins. Excludable started as to Khursheed Haider: T4 Start: 4/18/2025 Stop: 5/2/2025 (cc Sac Criminal Agencies) (Deputy Clerk: AMW) (Entered: 04/14/2025)	
<input type="checkbox"/>	<u>Online</u>	56	05/01/2025	STATUS MEMORANDUM by Khursheed Haider. (Reichel, Mark) Modified on 5/5/2025 (KML). (Entered: 05/01/2025)	
		57	05/02/2025	MINUTES for STATUS CONFERENCE held before District Judge Dena M. Coggins on 5/2/2025. Government Counsel, Alexis Klein, present. Defense Counsel, Mark Reichel, present. Defendant not present, 31 appearance waiver on file. The court and counsel discussed the status of the case. At the parties' joint request, a Change of Plea Hearing was SET for 5/16/2025 at 9:30 AM in Courtroom 8 before District Judge Dena M. Coggins. Time excluded as provided by Local Code T4: 5/2/2025 - 5/16/2025. Defense Counsel advised the court that he will confirm the Defendant's transportation with the U.S. Marshal's Service, but the court CONFIRMED the Defendant should be transported so that he can be personally present on 5/16/2025. Court Reporter: Kimberly Bennett. (Text Only Entry) (cc: USMS-Sacramento) (Deputy Clerk CRS) (Entered: 05/02/2025)	
<input type="checkbox"/>	<u>Free</u>	58	05/15/2025	STIPULATION and PROPOSED ORDER Continuance of Status Conference/Change of Plea Hearing by USA. (Klein, Alexis) (Entered: 05/15/2025)	
<input type="checkbox"/>	<u>Free</u>	59	05/15/2025	STIPULATION and ORDER signed by District Judge Dena M. Coggins on 5/15/2025 ORDERING the Change of Plea Hearing set for 5/16/2025 VACATED and RESET for 6/13/2025 at 9:30 AM in Courtroom 8 before District Judge Dena M. Coggins. Time is excluded as provided by Local Code T4: 5/16/2025 - 6/13/2025. (Deputy Clerk CRS) (Entered: 05/15/2025)	
		60	06/13/2025	MINUTES for STATUS CONFERENCE held before District Judge Dena M. Coggins on 6/13/2025. Government Counsel, Shea Kenny specially appearing for Alexis Klein, present. Defense Counsel, Mark Reichel, present. Defendant present, in custody. Defense Counsel advised the court that the Defendant is not prepared to proceed with a Change of Plea Hearing today, and requested a short continuance to allow Defense Counsel and the Defendant time to meet and prepare for a Change of Plea Hearing. Defense Counsel added that the Defendant's housing has changed which will make it easier to meet with him. The Prosecutor advised the court that he is covering for Ms. Klein and understands the plea offer has been pending for a while, but the expiration deadline will not be extended indefinitely. The court ORDERED a Change of Plea Hearing SPECIALLY SET for 6/18/2025 at 1:30 PM in Courtroom 8 before District Judge Dena M. Coggins. Time excluded as provided by Local Code T4: 6/13/2025 - 6/18/2025. Court Reporter: Abby Torres. (Text Only Entry) (cc: U.S. Marshal's Service, Priority) (Deputy Clerk CRS) (Entered: 06/13/2025)	
		61	06/18/2025	MINUTES for CHANGE OF PLEA HEARING held before District Judge Dena M. Coggins on 6/18/2025. Government Counsel, Jason Hitt, present. Defense Counsel, Mark Reichel, present. Defendant present, in custody. The parties confirmed they were ready to proceed. An executed Plea Agreement was presented in open court. The Defendant was sworn. After the plea colloquy, the court ACCEPTED the Defendant's GUILTY PLEA to Count 1 of the 11 Indictment and ADJUDGED the Defendant guilty. The original Plea Agreement was returned to the Prosecutor with the understanding that he would file it in CM/ECF as soon as practical. The matter was REFERRED to Probation for preparation of a Presentence	

Document:

2:23cr299, USA v. Haider

				Courtroom 8 before District Judge Dena M. Coggins. The court ORDERED the Defendant to be present at the 9/26/2025 Sentencing Hearing and remain in U.S. Marshal's custody pending sentencing. Court Reporter: Abby Torres. (Text Only Entry) (cc: Probation, Sacramento) (Deputy Clerk CRS) (Entered: 06/18/2025)	
<input type="checkbox"/>	Free	62	06/18/2025	SCHEDEULE of DISCLOSURE for PSR as to Khursheed Haider. Plea Date: *6/18/2025*, Sentencing Date: *9/26/2025*, Reply Date: *9/19/2025*, Correction Date: *9/12/2025*, Report Date: *9/5/2025*, Objection Date: *8/29/2025*, Proposed Date: *8/15/2025* (Deputy Clerk CRS) (Entered: 06/18/2025)	
<input type="checkbox"/>	Free	63	06/18/2025	PLEA AGREEMENT as to Khursheed Haider. This action involves victims and restitution. The US Attorney shall serve the victim: restitution spreadsheet on Probation within 14 days of the entry of plea. Attorney Hitt, Jason added. (Hitt, Jason) (Entered: 06/18/2025)	

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