



U.S. Department of Justice

United States Attorney
District of Oregon

312 United States Courthouse
620 S.W. Main
Portland, Oregon 97205

503/221-2101

April 1, 1986

Mr. Stephen A. Houze
Attorney at Law
1001 S.W. 5th Avenue
Suite 1007
Portland, Oregon 97204

RE: United States v. Ma Anand Sheela

Dear Mr. Houze:

This letter memorializes the agreement by which Ma Anand Sheela, aka Sheela Silverman, and the United States will dispose of all current and some potential federal charges she faces. The agreement is as follows:

1. Ma Anand Sheela will plead guilty to the following:
 - a. Count 1 of the indictment in the immigration case, United States v. Ma Anand Sheela, et al, CR 85-182.
 - b. Count 1 of the indictment in the wiretapping case, United States v. Ma Anand Sheela, et al, CR 85-278.
 - c. The indictment in the Salmonella poisoning case, United States v. Ma Anand Sheela, et al, CR 86-53. This guilty plea may be by way of Alford v. North Carolina, 400 U.S. 1.

2. Prior to imposition of sentence for the above offenses, Ma Anand Sheela will submit to a debtors examination wherein under oath Ma Anand Sheela will answer all questions pertaining to her financial affairs, past, present and future, which will be asked of her by representatives of the United States Attorneys Office and the Attorney General for the State of Oregon. Ma Anand Sheela expressly understands that any false statements knowingly made in her debtors examination will expose her to prosecution for perjury which carries a maximum penalty of five (5) years imprisonment and a fine of \$250,000, which penalties the Government is free to seek above and beyond any sentence imposed under this agreement.

3. Under the provision of Rule 11(e)(1)(c), F.R.Crim.P., the parties agree that the specific sentence to be imposed is as follows:

- a. A 4½ year period of imprisonment in case 85-53 (Salmonella poisoning)
- b. A 4½ year period of imprisonment in case 85-278 (wiretapping) to run concurrently with that in subparagraph A.
- c. A five year period of probation in case 85-182 (immigration) to begin after completion of imprisonment subject to the usual conditions of probation plus the following special conditions:
 - i) Ma Anand Sheela will depart the United States forthwith regardless of any conditions of parole which might be imposed.
 - ii) Ma Anand Sheela will voluntarily surrender her green card to the United States Immigration and Naturalization Service and sign a document abandoning permanent resident status in the United States.
 - iii) Ma Anand Sheela will not seek to re-enter the United States during the period of probation without express consent of the United States Attorney General.
- d. Imposition of any fine is left to the discretion of the court upon condition that if a fine is imposed it shall be made part of the judgement and not a condition of probation.

4. Both parties reserve their rights to submit information relevant to imprisonment and fines to the court and reserve their rights to recommend a specific fine within the range permitted by law and subject to the limitations in paragraph 3d.

5. Ma Anand Sheela will consent to and otherwise expedite the request of the United States Government that the Republic of West Germany expand the previous extradition order to permit prosecution of her in the United States for the offenses contained in case CR 85-278 (wiretapping) and in case CR 86-53 (Salmonella poisoning).

If the agreement as contemplated in this letter is not consummated, and the defendant is not sentenced thereunder, the United States will still seek a waiver of the Rule of Speciality and ask the German Government to expand the previous order to allow prosecution of Ma Anand Sheela on all additional federal charges, present and future. However, under such circumstances the United States Government will allow Ma Anand Sheela to withdraw her consent referred to above.

6. In exchange for the pleas of guilty contained in paragraph 3 and upon their acceptance by the court, the Government, at time of sentencing, will move to dismiss all other remaining charges against Ma Anand Sheela in cases CR 85-182 (immigration) and 85-278 (wiretapping) and further agrees not to prosecute her for the following uncharged offenses which Ma Anand Sheela may have committed between June 1981 and the date of this agreement:

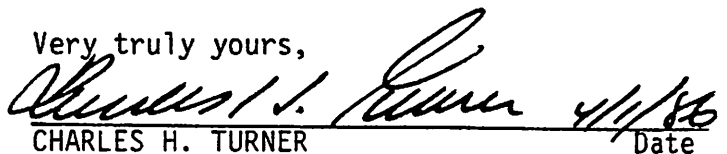
- a. Violations of federal income tax laws.
- b. Other violations of federal immigration laws.
- c. Violations of federal laws which prohibit smuggling of currency and other valuables and which prohibit taking U.S. currency in and out of the United States without disclosing it to the proper officials of the United States.
- d. Violations of all other federal laws with the express exception that if there are any homicides or unlawful killings which Ma Anand Sheela participated in as a principal, aider or abettor, conspirator, or accessory of any kind, the United States Government or the State of Oregon will be free to prosecute Ma Anand Sheela for such offenses and seek all penalties permitted by law including maximum incarceration and consecutive sentences. In this regard you have indicated to us that you are aware of no possible additional federal charges and the United States, at this time, is aware of no such possible additional federal charges except those specifically referred to in this letter.

7. Ma Anand Sheela expressly understands that the Government has received allegations that she may have been involved in a plan to assault and/or murder officials of the United States, that these allegations are under investigation by the United States Government and that the agreement contained in this letter excludes these allegations, such that if the allegations are verified the U.S. Government is not prevented from prosecuting Ma Anand Sheela for such offenses or from seeking penalties for such offenses up to the maximum permitted by law, including consecutive sentences.

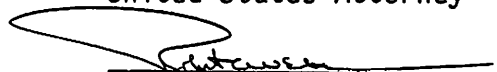
8. The United States Government will not oppose the defendant's request that her place of incarceration be the Federal Correctional Institution at Pleasanton, California, upon the understanding that the final decision as to place of incarceration rests exclusively with the Federal Bureau of Prisons and neither with the United States Attorney nor the United States District Court.

Both parties acknowledge that there are no other promises, representations or agreements between the parties beyond those contained in this letter, and agree with each and every term contained herein.

Very truly yours,


 CHARLES H. TURNER
 United States Attorney

4/1/86
 Date


 ROBERT C. WEAVER
 Chief, Criminal Division

4/1/86
 Date

 MA ANAND SHEELA Date