

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3 SEATTLE DIVISION
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6 UNITED STATES OF AMERICA §
7 §
8 v. § CAUSE NO.: 2:24-CR-00232-LK
9 §
10 CAMERON JOHN WAGENIUS §
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14 **NOTICE OF INTENT TO PLEAD GUILTY IN OPEN COURT WITHOUT**
15 **BENEFIT OF PLEA AGREEMENT**
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19 **TO THE HONORABLE LAUREN KING, UNITED STATES**
20 **DISTRICT JUDGE:**

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22 JAMES LEE BRIGHT, retained counsel for CAMERON JOHN
23 WAGENIUS, respectfully notifies the Court of CAMERON JOHN WAGENIUS’
24 intent, pursuant to FED. R. CRIM. P. 11(a)(1), to plead guilty in open court without
25 benefit of plea agreement to the two-count indictment signed by the jury
26 foreperson on December 18, 2025.
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I. COUNTS AND OFFENSES

CAMERON JOHN WAGENIUS was charged, via indictment, on the 18th day of December, 2024 with one count of 18 U.S.C. § 1039(b): Unlawful Transfer of Confidential Phone Records Information, to wit, Online Forum; and one count of 18 U.S.C. § 1039(b): Unlawful Transfer of Confidential Phone Records Information, to wit, Online Communications Platform. CAMERON JOHN WAGNIUS intends to plead guilty to both counts of the indictment.

II. ELEMENTS OF THE OFFENSE

Section 1039 of Title 18 of the United States Code governs fraud and related activity in connection with obtaining confidential phone records information of a covered entity. Section 1039(b) governs the prohibition on sale or transfer of confidential phone records information:

(1) Except as otherwise permitted by applicable law, whoever, in interstate or foreign commerce, knowingly and intentionally sells or transfers, or attempts to sell or transfer, confidential phone records information of a covered entity, without prior authorization from the customer to whom such confidential phone records information

47 relates, or knowing or having reason to know such information was
48 obtained fraudulently, shall be fined under this title, imprisoned not
49 more than 10 years, or both.

50 **(2)** For purposes of this subsection, the exceptions specified in section
51 222(d) of the Communications Act of 1934 shall apply for the use of
52 confidential phone records information by any covered entity, as
53 defined in subsection (h).

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III. PENALTIES

56 As provided in 18 U.S.C. 1039(b), the maximum penalty is a fine not to
57 exceed \$250,000 and/or imprisonment for up to ten years on each of the two
58 counts. Section 1039 does not make provision for a minimum punishment for the
59 instant offense(s).

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IV. COLLATRAL CONSEQUENCES

62 CAMERON JOHN WAGENIUS understands that there are collateral
63 consequences to pleading guilty and being convicted of the charges in the
64 indictment. Said consequences include, but are not limited to:

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- 65 1) The potential loss of the right to vote in Federal elections, and the
66 potential loss of the right to vote in state and local elections.
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68 2) The loss of the right to hold federal office or employment.

69 3) The loss of eligibility to serve in the armed forces and the loss of
70 benefits from previous armed forces service.
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72 4) The loss of the right to serve on a federal jury.

73 5) The loss of the right to own or possess firearms.

74 6) The loss of the right to federal assistance programs.

75 7) The loss of the right to federal housing.
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77 **V. STATEMENT OF FACTS**

78 The defendant, CAMERON JOHN WAGENIUS, and his attorney, JAMES
79 LEE BRIGHT, hereby stipulate that at all times, relevant to the indictment herein,
80 the following facts are true:

- 81 1) That the Defendant, CAMERON JOHN WAGENIUS, who is
82 entering a plea of guilty to Counts One and Two of the indictment is
83 the same person charged in the Indictment.

84 2) That the events described in Counts One and Two of the
85 Indictment occurred in the Western District of Washington and

86 elsewhere.

87 3) That CAMERON JOHN WAGENIUS did unlawfully transfer
88 confidential phone records information through online forums and
89 online communications platforms.

90 4) CAMERON JOHN WAGENIUS agrees that he committed all
91 essential elements of the offenses. This factual resume is not intended
92 to be a complete accounting of all the facts and events related to the
93 offense charged in this case. The limited purpose of this factual
94 resume is to demonstrate the factual basis exists to support the
95 Defendant's guilty plea to Counts One and Two of the Indictment.

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VI. WAIVER OF RIGHTS

98 Defendant's attorney, JAMES LEE BRIGHT, has reviewed the rights that
99 defendant, CAMERON JOHN WAGENIUS, waives upon entry of a guilty plea.

100 Among these rights are:

101 1) The right to a speedy trial and public trial by a jury;

102 2) The right to the assistance of counsel at trial and at all stages of the
103 proceedings;

- 104 3) The right to see and hear all adversarial witnesses, and the right to confront
105 those witnesses through cross-examination;
- 106 4) The right to use the power and process of the Court to compel the production
107 of any evidence, including the attendance of any friendly witnesses; and
- 108 5) The right against self-incrimination by taking the witness stand, and that
109 failure to testify in one’s own defense may not be used as an inference of
110 guilt.

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112 **VII. STATEMENT REGARDING PLEA OFFERS**

113 Attorney JAMES LEE BRIGHT and defendant CAMERON JOHN
114 WAGENIUS have reviewed all plea negotiations and offers, and this entry of a
115 plea of “guilty” is not the result of a plea agreement between the Government and
116 the Defense.

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118 Respectfully submitted,

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121 /s/ James Lee Bright
122 JAMES LEE BRIGHT
123 Attorney for CAMERON JOHN WAGENIUS
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CAMERON JOHN WAGENIUS
Defendant

CERTIFICATE OF SERVICE

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I, JAMES LEE BRIGHT, certify that on this the 19th day of
February, 2025, a copy of this filing was
electronically served via the ECF filing system to the United States Attorney's
Office for the Western District of Washington, Seattle Division.

/s/ James Lee Bright
JAMES LEE BRIGHT
Attorney for CAMERON JOHN WAGENIUS