

1 TODD BLANCHE  
 Deputy Attorney General  
 2 BILAL A. ESSAYLI  
 First Assistant United States Attorney  
 3 ALEXANDER B. SCHWAB  
 Assistant United States Attorney  
 4 Acting Chief, Criminal Division  
 CLIFFORD D. MPARE (Cal. Bar No. 337818)  
 5 Assistant United States Attorney  
 Major Crimes Section  
 6 LAUREN E. BORDER (Cal. Bar No. 327770)  
 Assistant United States Attorney  
 7 General Crimes Section  
 1200 United States Courthouse  
 8 312 North Spring Street  
 Los Angeles, California 90012  
 9 Telephone: (213) 894-4962/8231  
 Facsimile: (213) 894-0141  
 10 E-mail: clifford.mpare@usdoj.gov  
 lauren.border@usdoj.gov

11 Attorneys for Plaintiff  
 12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 CYNTHIA RAYGOZA,  
 aka "Cynthia Curiel Curiel,"  
 19 ASHLEIGH BROWN,  
 aka "ice\_out\_ofla,"  
 20 aka "corn\_maiden\_design," and  
 SANDRA CARMONA SAMAME,  
 21 aka "Sandra Karmona,"  
 aka "Sandra Carolina Carmona  
 22 Samame,"  
 aka "Sandra Carmona Samane,"  
 23

24 Defendants.

No. 2:25-cr-00780-SVW

GOVERNMENT'S MOTION IN LIMINE #2  
TO ADMIT RELEVANT EVIDENCE OF  
CONDUCT POST-LIVESTREAM

Hearing Date: February 9, 2026 at  
 11:00 a.m.  
 Trial Date: February 24, 2026  
 Time: at 9:00 a.m.  
 Location: Courtroom of the  
 Hon. Stephen V.  
 Wilson

26 Plaintiff United States of America, by and through its counsel  
 27 of record, the Assistant United States Attorneys Clifford D. Mpare  
 28 and Lauren E. Border, hereby files its motion in limine to admit



**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Defendants CYNTHIA RAYGOZA ("Raygoza"), ASHLEIGH BROWN ("Brown"), and SANDRA SAMAME ("Samame") (collectively, "defendants") followed an ICE agent home from work, harassed him and his family, and live-streamed on social media an address approximately 100 feet from the agent's home, inviting viewers to "come on down." Defendants have been indicted with (1) conspiring to release restricted personal information of an ICE agent, and (2) stalking him.

The government intends to offer in its case-in-chief several pieces of evidence relating to conduct occurring directly after defendants live-streamed the neighborhood address of the ICE agent. First, the government will seek to introduce evidence of the response to defendants' live-stream. Specifically, the government will present testimony that after providing information about the ICE agent's neighborhood on their live-streams, other individuals arrived in the neighborhood. Second, the government will seek to introduce evidence of the Baldwin Park Police Department's ("BPPD") response to defendants' conduct. Specifically, the government will present testimony about BPPD's response, and recordings of body-worn video memorializing that response, including, among other things, a comment by one of the individuals arriving in the neighborhood exclaiming, "Let's dox them!" Both these threads of evidence are directly relevant to the government's case-in-chief and should be admitted under Federal Rule of Evidence 403.

1 **II. FACTUAL BACKGROUND**

2 **A. Defendants Follow R.H. Home from Work to Harass Him**

3 On August 28, 2025, the three defendants in this case got into  
4 Brown's car and followed an ICE agent ("R.H.")<sup>1</sup> from the federal  
5 building located at 300 North Los Angeles Street to his home in  
6 Baldwin Park -- approximately 15 miles and more than a 20-minute  
7 drive. R.H. realized he was being followed, but believed he had lost  
8 the car that was tailing him. When defendants reached R.H.'s home in  
9 a residential neighborhood, wearing black masks, they yelled at him  
10 in front of his wife and children and shouted to his neighbors while  
11 walking up and down the block that he was an ICE agent.

12 Defendants live-streamed the events on social media accounts.  
13 This live-stream captured defendants following R.H. to the street  
14 where he lived and their subsequent confrontation with him. R.H.'s  
15 wife, and a neighbor concerned by defendants' yelling and face  
16 coverings, separately called 911. Shortly after their calls, BPPD  
17 officers arrived. Defendants announced on their live-stream a street  
18 name, residence number, and city that identified R.H.'s block. They  
19 zoomed in on R.H.'s face, saying: "There's the ICE agent. This is  
20 where he lives apparently," and "the neighbors didn't know - now they  
21 know." Defendants also told the followers to "come on down" to the  
22 Baldwin Park neighborhood. Minutes later, other individuals did  
23 indeed arrive outside R.H.'s home. The individuals verbally accosted  
24 the BPPD officers, and one individual exclaimed: "Let's dox them!"

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<sup>1</sup> The complaint in this action refers to the victim as "R.R.,"  
28 whereas the indictment refers to him as "R.H." Before the events in  
this case, the victim changed his name from R.R. to R.H. to reflect a  
family name.

1           **B. Procedural History**

2           For their conduct, a grand jury indicted defendants on September  
3 23, 2025, in a two-count indictment charging defendants with  
4 conspiracy (18 U.S.C. § 371) and publicly disclosing the victim's  
5 personal address (18 U.S.C. § 119(a)). The government ultimately  
6 determined that defendants failed to state the victim's actual home  
7 address, as required under 18 U.S.C. § 119(a), and instead said the  
8 number of a neighbor's home approximately 100 feet from the victim's  
9 home. (Dkt. 98 at 4 n.4.) Accordingly, the government moved to  
10 dismiss, and the Court dismissed Count Two of the indictment. (Dkts.  
11 97, 99.)

12           Then, on January 15, 2026, a grand jury returned a first  
13 superseding indictment charging defendants with the same conspiracy  
14 and adding a charge of stalking (18 U.S.C. § 2261A) (Dkt. 103). The  
15 conspiracy charge in the superseding indictment amended the  
16 allegation to indicate that defendants disclosed "an address  
17 approximately 100 feet" from the victim's home.<sup>2</sup>

18           **III. ARGUMENT**

19           **A. Legal Standard**

20           Evidence must be relevant to defendant's guilt to be admissible.  
21 Any evidence that is "relevant" to the charged offenses "is  
22 admissible," unless otherwise prohibited by federal law. See Fed. R.  
23 Evid. 402. Under Rule 401, "[e]vidence is relevant if" "it has any  
24 tendency to make a fact more or less probable than it would be  
25 without the evidence." Fed. R. Evid. 401 (emphasis added). Thus, to  
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28           <sup>2</sup> Counsel for Samame also informed the government that her true  
and correct last name is "Samame" rather than "Samane," thus the  
government corrected the indictment accordingly.

1 be directly "relevant" to the charged crimes, evidence need not be  
2 conclusive proof of a fact sought to be established, or even strong  
3 evidence of the same. All that is required is a "tendency" to  
4 establish the fact at issue. Id.

5 Accordingly, evidence that tells the "story of guiltiness" or  
6 provides context to the charged crimes is direct evidence and should  
7 be admitted. Old Chief v. United States, 519 U.S. 172, 188 (1997)  
8 ("[T]he prosecution may fairly seek to place its evidence before the  
9 jurors, as much to tell a story of guiltiness as to support an  
10 inference of guilt, to convince the jurors that a guilty verdict  
11 would be morally reasonable as much to point to the discrete elements  
12 of a defendant's legal fault.")

13 The Court may "exclude relevant evidence" if the probative value  
14 is outweighed by a "danger" of "unfair prejudice, confusing the  
15 issues, misleading the jury, undue delay," or "wasting time." Fed.  
16 R. Evid. 403. Because "relevant evidence is inherently prejudicial,"  
17 it is "only unfair prejudice, substantially outweighing probative  
18 value" that justifies "exclusion of relevant matter under Rule 403."  
19 United States v. Hankey, 203 F.3d 1160, 1172 (9th Cir. 2000).

20 **B. The Court Should Admit the Proffered Evidence as Relevant**

21 The government must prove three elements to establish  
22 defendants' guilt for conspiracy: First, that beginning and ending on  
23 August 28, 2025, there was an agreement between defendants to commit  
24 a violation of 18 U.S.C. § 119(a),<sup>3</sup> which prohibits doxxing federal  
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26 <sup>3</sup> The anti-doxxing statute, in turn, makes it a crime to:  
27 (1) knowingly make restricted personal information about a covered  
28 person, or a member of the immediate family of that covered person,  
publicly available; (2) with the intent to threaten, intimidate, or  
incite the commission of a crime of violence against that covered  
(footnote cont'd on next page)

1 agents; second, that defendants became members of the conspiracy  
2 knowing of at least one of its objects and intending to help  
3 accomplish it; and third, that one of the defendants of the  
4 conspiracy performed at least one overt act on or after August 28,  
5 2025 for the purpose of carrying out the conspiracy. Ninth Circuit  
6 Model Criminal Jury Instructions, No. 11.1 (2024 ed.).

7 The government must also prove three elements to establish  
8 defendants' guilt for stalking: that defendants (1) with the intent  
9 to harass or intimidate another person, or placing under surveillance  
10 with the intent to harass or intimidate another person, (2) used the  
11 mail, any interactive computer service or electronic communication  
12 service or electronic communication system of interstate commerce, or  
13 any other facility of interstate or foreign commerce; (3) to engage  
14 in a course of conduct that caused, attempted to cause, or would  
15 reasonably be expected to cause, substantial emotional distress to  
16 that person, or an immediate family member of that person, or a  
17 spouse or intimate partner of that person. See 18 U.S.C.  
18 § 2261A(2) (b).

19 The proffered evidence is directly relevant to these charges and  
20 tends to prove defendants' guilt for both conspiracy and stalking.  
21 The proffered evidence is not unduly prejudicial, as it is not  
22 intended to be introduced to confuse the issues, mislead the jury,  
23 cause undue delay, or waste time. As such, the proffered evidence  
24 should be admitted consistent with Rule 403.

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27 person, or a member of the immediate family of that covered person;  
28 or with the intent and knowledge that the personal information will  
be used to threaten, intimidate, or facilitate the commission of a  
crime of violence against that covered person, or a member of the  
immediate family of that covered person.

1           1.    The Proffered Evidence is Relevant

2           The government intends to introduce evidence in its case-in-  
3 chief related to the direct aftermath of defendants' live stream in  
4 R.H.'s neighborhood. Specifically, the proffered evidence will show  
5 that within minutes of defendants' confrontation with R.H., and  
6 defendants' instruction via live-stream for viewers to "come on down"  
7 to R.H.'s neighborhood, a collection of individuals did - in fact -  
8 arrive in the residential area of Baldwin Park near R.H.'s home.  
9 What occurred next is unsurprising. After responding to calls about  
10 a disturbance in the neighborhood, BPPD officers and the group of  
11 individuals that had come to the neighborhood began to address one  
12 another heatedly. During this interaction, which is captured on  
13 video, one of the protestors can audibly be heard exclaiming, "Let's  
14 dox them!"<sup>4</sup> The government intends to introduce evidence of the  
15 influx of people entering the Baldwin Park area after defendants'  
16 live-stream, BPPD's response to this event, and the statement made by  
17 one of the individuals regarding doxxing BPPD officers.

18           This evidence is relevant to both charges. With respect to the  
19 conspiracy to dox R.H., the evidence relates to defendants' mental  
20 state, i.e., whether defendants intended to enter into the agreement  
21 to publicize R.H.'s address. The proffered evidence that:

- 22 (1) minutes after defendants' live-stream other individuals arrived  
23 at the Baldwin Park neighborhood referenced in the videos; and  
24 (2) one of the unidentified co-conspirators specifically suggested  
25 doxxing the law enforcement officers responding to the incident, tend  
26 to prove defendants entered into the conspiracy intending to dox R.H.

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<sup>4</sup> The video has been produced to all parties as USAO\_BWC\_008.

1 Similarly, for the stalking count, the government must prove  
2 beyond a reasonable doubt that defendants' course of conduct caused,  
3 attempted to cause, or would be reasonably expected to cause  
4 substantial emotional distress to R.H. or his immediate family  
5 members. One of defendants' purposes in live-streaming R.H.'s  
6 neighborhood and the location of his home was for other people to  
7 come to his neighborhood. In sum, the entire purpose of their  
8 actions was to cause discomfort and emotional distress to R.H. and  
9 his family. The conduct that occurred after, including the  
10 altercation with BPPD officers, illuminates defendants' purpose and  
11 the measures they took to satisfy that purpose. As a related point,  
12 the government must prove that defendants had the intent to harass or  
13 intimidate another person, or placed under surveillance with the  
14 intent to harass or intimidate another person. The proffered  
15 evidence tends to support this charge as well for similar reasons.  
16 Namely, this evidence shows not only that defendants placed R.H.  
17 under surveillance (by live-streaming him, his address, and his  
18 family), but also that they intended to harass or intimidate him by  
19 calling for other individuals to arrive at the neighborhood for the  
20 same purpose. And evidence of the altercation between these  
21 individuals and BPPD further supports that defendants knew and  
22 intended for such activity to occur when they began to live-stream  
23 and provide information about R.H. in a public fashion. The evidence  
24 is integral to the government's ability to tell the "story of  
25 guiltiness" or provides context to the charged crimes is direct  
26 evidence and should be admitted. Old Chief v. United States, at 188.  
27 Indeed, the proffered evidence is directly relevant in assisting the  
28 jury to understand defendants' mental state, and the harassing or

1 intimidating nature of their conduct, and is thus admissible under  
2 Rule 403.

3 2. The Proffered Evidence is Not Unduly Prejudicial

4 Whatever inherent prejudicial impact the proffered evidence has  
5 is minimal and does not substantially outweigh its probative value.  
6 To the contrary, as outlined above, the proffered evidence will  
7 assist the jury in understanding the sequence of events that  
8 establishes defendants' mental state. The proffered evidence will  
9 establish a clear timeline between (1) defendants' initial agreement;  
10 (2) their rally cry for others to assist in the intimidation and  
11 harassment of R.H. and his family; (3) the direct response of others  
12 to defendants' call; and (4) the ultimate goal of defendants in  
13 advertising R.H.'s address to their social media onlookers. Each of  
14 these inquiries is critical to the jury's understanding of the  
15 government's theory and, in sum, outweighs any limited prejudice the  
16 proffered evidence inherently holds. Accordingly, the evidence is  
17 both relevant and admissible and the Court should grant the  
18 government's motion in limine.

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