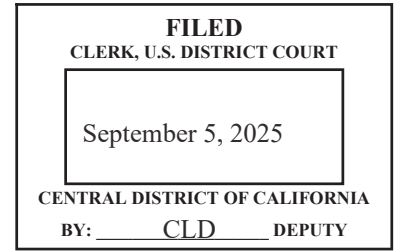


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Original



UNITED STATES DISTRICT COURT
for the
Central District of California



United States of America

v.

CYNTHIA RAYGOZA,
ASHLEIGH BROWN, and
SANDRA CARMONA SAMANE,

Defendants.

Case No. 2:25-mj-05520-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, Robert Kurtz III, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of August 28, 2025, in the county of Los Angeles in the Central District of California, the defendants violated:

Code Section

18 U.S.C. §§ 371, 119

Offense Description

Conspiracy to Publicly Disclose the
Personal Information of a Federal Agent

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

/s/

Complainant's signature

Robert Kurtz III, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: September 5, 2025

Judge's signature

City and state: Los Angeles, California

Hon. Alka Sagar, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Robert Kurtz, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a of a criminal complaint against, and arrest warrants for: Cynthia RAYGOZA ("RAYGOZA"), Ashleigh BROWN ("BROWN"), and Sandra CARMONA SAMANE ("SAMANE") for violations of 18 U.S.C. §§ 371, 119 (Conspiracy to Publicly Disclose the Personal Information of a Federal Agent).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested search warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only and all dates and times are on or about those indicated.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent with the Department of Homeland Security, United States Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI") assigned to the HSI Los Angeles office, El Camino Real Financial Crimes Task Force. Since my entry on duty of September 15, 2019, I attended the Federal Law Enforcement Training Center and completed the

Criminal Investigator Training Program and Homeland Security Investigations Special Agent Training. In total I have received over 700 hours of training between the two aforementioned trainings on how to conduct investigations into crimes including but not limited to conspiracy, money laundering, cybercrime, and identity theft. I have investigated numerous individuals/entities for a wide range of both federal and state violations of law, during which I have also worked in conjunction with multiple other law enforcement agencies. During this investigation, I used a variety of investigative techniques and resources, interviews, retrieving video surveillance footage, and the review of various databases and records. This affidavit does not include all the investigative information discovered in this case but the information necessary to establish probable cause.

III. STATEMENT OF PROBABLE CAUSE

4. Based on my review of law enforcement reports and social media video, and my conversations with other law enforcement officers and personnel, I know the following:

5. At approximately 12:30 p.m. on August 28, 2025, ICE Deportation Officer ("DO") R.R. reported that he left his workplace at the Federal Building located at 300 N Los Angeles St. in Los Angeles, California (the "Federal Building") after performing his official duties. DO R.R. proceeded to his home address in Baldwin Park, California. On the way home, he noticed a black sedan following him. After making efforts to lose the black sedan following him, he continued to his home residence.

6. After arriving at his residence, DO R.R. reported that he got into his personal vehicle with his spouse. He then saw two masked females approaching his personal vehicle who appeared to be recording with their phones. DO R.R. also saw the same black sedan that had previously been following him parked in his neighbor's driveway. The black sedan had a Colorado license plate with the plate number ending in "063." DO R.R. also saw there was a third masked female by the black sedan that also appeared to be recording.

7. According to DO R.R., the three females began yelling and shouting (in substance and summary) that DO R.R. was an ICE agent. They also shouted DO R.R.'s personal home address. As they did so, they appeared to be filming their actions on their phones, and possibly live streaming their actions on social media.¹ Given the actions by the three females, DO R.R. decided to call the police.

8. While waiting for police to arrive, DO R.R. exited his personal vehicle and confronted the masked females. According to DO R.R., one of the masked females, later identified as RAYGOZA, placed a hand on DO R.R., pushed him, and threatened to throw her coffee cup at him.

9. I have reviewed a police report composed by an officer from the Baldwin Park Police Department ("BPPD") who responded to DO R.R.'s home after he called the police. Based on my

¹ To that point, later in the afternoon (after the masked females repeatedly announced DO R.R.'s home personal address while filming with their phones), another vehicle arrived and approximately four to five passengers exited the vehicle and joined in yelling at DO R.R.

review of that report, BPPD personnel arrived to DO R.R.'s home at approximately 12:55 pm and arrested for battery the female who allegedly pushed DO R.R., who BPPD identified as RAYGOZA. BPPD officers also identified BROWN at the scene and determined that the black sedan that was following DO R.R. (and parked in his neighbor's driveway) was registered to BROWN. I also reviewed videos posted to social media of BROWN telling BPPD officers that the black sedan is hers.

10. Additionally, according to the same BPPD report, a BPPD officer interviewed SAMANE while on scene outside DO R.R.'s home and she said (in substance and summary):

a. She and her friends were driving and they pulled into the driveway of DO R.R.'s neighbor's house to make a U-turn;

b. At that point, DO R.R.'s car drove up and partially blocked the path of the car she was in with her friends; and

c. She exited the car to help guide her friend (who was driving) around DO R.R.'s car when DO R.R.'s car reversed and hit her.

11. According to the BPPD report, after RAYGOZA was arrested, BROWN and SAMANE arrived at the BPPD station and asked to speak with the officer who composed the report. BROWN and SAMANE said they wanted to share videos of the above-described incident with the officer. When the officer watched the videos they shared, however, the officer could not confirm SAMANE's

account of being hit by DO R.R.'s car because the video was "shakey."

12. Following a search of social media, federal agents determined that at the time of the incident, two Instagram users were broadcasting a live stream of the above-described events. These Instagram users were: "defendmesoamericanculture" and "ice_out_ofla." In addition, "ice_out_ofla" shared the videos that it was live streaming on a separate account, "corn_maiden_design." Based on federal law enforcement's review of the live stream videos on all three accounts, it appears that the live streams were being broadcasted from the females who followed and approached DO R.R. in the black sedan. Specifically, the live stream videos appeared to be filmed from the perspective of the car that was following DO R.R. from the Federal Building to his residence in Baldwin Park. During the recording, three female voices can be heard speaking within the car. Later, the live stream videos depicted the persons who appeared to be holding the devices that were filming the videos shouting at DO R.R. and his wife, and walking up and down the residential street yelling "la migra lives here" and "ice lives on your street and you should know". The two users also repeatedly yelled out DO R.R.'s home address on the live stream.

13. Shortly after the incident, the videos were taken down from the "ice_out_ofla" and "defendmesoamericanculture" accounts. Based on my training and experience, deleting or removing publicly facing posts or information that would

otherwise be incriminating is often a tactic used to avoid arrest and detention by law enforcement.

14. Law enforcement was able to trace the account "ice_out_ofla" to BROWN. Federal agents are familiar with BROWN's voice and appearance because, on August 2, 2025, BROWN was arrested and charged with assault on a federal officer for an incident that occurred at the Federal Building.² Since that date, federal law enforcement officers have seen her near the Federal Building on several other occasions. Law enforcement identified BROWN's voice on the live stream videos of the incident posted from the account "ice_out_ofla." In addition, the "ice_out_ofla" account previously posted selfies of BROWN on the account page.

15. Law enforcement also traced the account "corn_maiden_designs" to BROWN by identifying selfies of BROWN on the account page. In addition, "ice_out_ofla" shared its live stream videos of the incident to the "corn_maiden_designs" account. Additionally, during a review of the account "defendmesoamericanculture," federal law enforcement personnel identified pictures of RAYGOZA posted on the account.

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² The charge in that complaint is now captioned as Central District of California case number 25-CR-701-FMO after BROWN was charged via information with a violation of 18 U.S.C. § 111.

