

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
 JOHNPAUL LECEDRE (Cal. Bar No. 303100)
 5 Assistant United States Attorney
 Post-Conviction and Special Litigation Section
 6 1400 United States Courthouse
 312 North Spring Street, 14th floor
 7 Los Angeles, California 90012
 Telephone: (213) 894-4447
 8 Facsimile: (213) 894-0142
 E-mail: johnpaul.lecedre@usdoj.gov
 9

Attorneys for Plaintiff
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 RUSSELL GOMEZ DZUL,
 17 a.k.a "Russell Ozul Gomez,"
 a.k.a "Russell Dzul Gomez,"

18 Defendant.
 19

No. CR 2:25-00503-BFM

DISPUTED JOINT STATEMENT OF THE CASE

Trial Date: January 12, 2026
 Time: 8:30 a.m.
 Location: Courtroom of the
 Hon. Brianna Fuller
 Mircheff

20
 21 Plaintiff United States of America, by and through its counsel
 22 of record, Assistant United States Attorney JohnPaul LeCedre; and
 23 Defendant Russell Gomez Dzul, by and through his counsel of record
 24 Deputy Federal Public Defenders Hannah A. Bogen and James S. Threatt
 25 hereby file its Disputed Joint Statement of the Case in accordance
 26 with the Court's Standing Order. Dkt. 52.
 27
 28

1 Consistent with the Court's Standing Order, this Disputed Joint
2 Statement of the Case includes: (1) the Government's Proposed
3 Statement of the Case, (2) the Defense's Proposed Statement of the
4 Case, and (3) a "redline" comparing the parties' proposed
5 statements. The parties affirm that they have met and conferred
6 regarding these statements prior to jointly submitting these filings.

7 The redactions contained herein are in accordance with the
8 Protective Order filed by the parties and ordered by the Court.
9 Dkts. 66, 67.

10

11 Dated: December 29, 2025

12

TODD BLANCHE
Deputy Attorney General

13

BILAL A. ESSAYLI
First Assistant United States
Attorney

14

15

ALEXANDER B. SCHWAB
Assistant United States Attorney
Acting Chief, Criminal Division

16

17

/s/ JohnPaul LeCedre
JOHNPAUL LECEDRE
Assistant United States Attorney

18

19

Attorneys for Plaintiff

20

21

22

23 Dated: December 29, 2025

/s/ by written consent
HANNAH A. BOGEN
JAMES S. THREATT
Deputy Federal Public Defenders

24

25

Attorneys for Defendant

26

27

28

GOVERNMENT'S PROPOSED STATEMENT OF THE CASE

1
2 This is a criminal case brought by the United States. The
3 defendant, Russell Gomez Dzul, is charged in a one-count information
4 with Assaulting a Federal Officer in violation of Title 18, United
5 States Code, Section 111(a). The government alleges that on June 7,
6 2025, O [REDACTED] I [REDACTED], a federal officer, was performing an official duty
7 at a location in Los Angeles, California, and that the defendant
8 forcibly assaulted him. The defendant has pleaded not guilty to the
9 charge.

10 The charges in this case are not evidence. The defendant has
11 pleaded not guilty to the charge. The defendant is presumed to be
12 innocent unless and until the government proves the defendant guilty
13 beyond a reasonable doubt. In addition, the defendant does not have
14 to testify or present any evidence. The defendant does not have to
15 prove innocence; the government has the burden of proving every
16 element of the charge beyond a reasonable doubt.

DEFENSE PROPOSED STATEMENT OF THE CASE

1
2 This is a criminal case brought by the United States. The
3 defendant, Russell Gomez Dzul, is charged in a one-count information
4 with Assaulting a Federal Officer in violation of Title 18, United
5 States Code, Section 111(a).

6 The government alleges that on June 7, 2025, a California Border
7 Patrol agent, O.I., was performing immigration-related enforcement at
8 a location in Los Angeles, California, and arrested the defendant.
9 The government alleges that the defendant, while detained in the back
10 of his vehicle, forcibly assaulted that agent who stood outside of
11 the vehicle. The defendant has pleaded not guilty to the charge.

12 The charges in this case are not evidence. The defendant has
13 pleaded not guilty to the charge. The defendant is presumed to be
14 innocent unless and until the government proves the defendant guilty
15 beyond a reasonable doubt. In addition, the defendant does not have
16 to testify or present any evidence. The defendant does not have to
17 prove innocence; the government has the burden of proving every
18 element of the charges beyond a reasonable doubt.

19
20
21
22
23
24
25
26
27
28

STATEMENT OF THE CASE (REDLINE)

1
2 This is a criminal case brought by the United States. The
3 defendant, Russell Gomez Dzul, is charged in a one-count information
4 with Assaulting a Federal Officer in violation of Title 18, United
5 States Code, Section 111(a).

6 The government alleges that on June 7, 2025, ~~§ [REDACTED], a~~
7 ~~federal officer,~~ a California Border Patrol agent, O.I., was
8 performing ~~an official duty~~ immigration-related enforcement at a
9 location in Los Angeles, California, and arrested the defendant. The
10 government alleges that the defendant, while detained in the back of
11 his vehicle, forcibly assaulted ~~him~~ that agent who stood outside of
12 the vehicle. The defendant has pleaded not guilty to the charge.

13 The charges in this case are not evidence. The defendant has
14 pleaded not guilty to the charge. The defendant is presumed to be
15 innocent unless and until the government proves the defendant guilty
16 beyond a reasonable doubt. In addition, the defendant does not have
17 to testify or present any evidence. The defendant does not have to
18 prove innocence; the government has the burden of proving every
19 element of the ~~charge~~ charges beyond a reasonable doubt.

20
21
22
23
24
25
26
27
28