

1 Katherine McBroom, CBN 223559
2 KAEDIAN LLP
3 242 26th Street, Unit C
4 Santa Monica, Ca 90402
5 kmcbroom@kaedianllp.com
6 Telephone: (310) 666-5198

7 Attorney for Defendant
8 JONATHAN REDONDO-ROSALES

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 JONATHAN REDONDO-ROSALES
16
17 Defendant.

CASE NO. CR 25-679-JLS
DEFENDANT JONATHAN REDONDO-ROSALES' MOTION TO COMPEL BRADY DISCOVERY
Hearing Date: January 23, 2026
Hearing Time: 8:30 a.m.
Trial Date: February 3, 2026
Location: Courtroom of the Hon. Josephine L. Stanton

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS

MEMORANDUM OF POINTS AND AUTHORITIES 3

I. INTRODUCTION 3

II. RELEVANT FACTS 4

 A. FPS Inspector Z.C.’s Criminal History And Attempts to Conceal His Criminal History Are *Brady* and *Henthorn* Materials are Relevant to the Elements of the Charge, The Defense Of Self-Defense, The Jury Instructions and Pending Defense Motions 9

 B. The Personnel Files of FPS Witnesses Must Be Disclosed 10

 C. The Government Should be Required to Produce Complete Personnel Files for Inspectors Z.C., William Terpstra, and Brian Murberg 11

III. CONCLUSION..... 12

1 Defendant, Jonathan Redondo-Rosales, by and through his counsel of record,
2 Katherine C. McBroom, hereby moves this Court to compel the government to
3 immediately produce *Brady/Henthorn* discovery as follows:

- 4 • Complete personnel files for Department of Homeland Security Federal
5 Protection Service Inspector Z.C., who claims to be the victim of a battery in this
6 matter, limited to his criminal history, his representations to DHS and/or FPS
7 concerning his criminal history or lack thereof, complaints of false reporting, and
8 use of excessive force.
- 9 • The identities of individuals in the United States Attorney's Office to whom
10 Inspector Z.C. made misrepresentations concerning his criminal history.
- 11 • Complete personnel files of Department of Homeland Security Federal
12 Protection Service Inspectors Eric Murberg and William Terpstra, limited to
13 complaints, investigations of, and/or disciplinary measures relating to false
14 reporting and use of excessive force.
- 15 • Any and all complaints, whether by civilians or law enforcement, alleging false
16 reporting by Department of Homeland Security Federal Protection Service
17 Inspectors Z.C., Eric Murberg, and William Terpstra.
- 18 • Any and all complaints, whether by civilians or law enforcement, alleging false
19 reporting by Department of Homeland Security Federal Protection Service
20 Inspectors Z.C., Eric Murberg, and William Terpstra.
- 21 • Any and all disciplinary actions suffered by Department of Homeland Security
22 Federal Protection Service Inspectors Z.C., Eric Murberg, and William Terpstra
23 for false reporting.
- 24 • The number of times since January 2025, Department of Homeland Security
25 Federal Protection Service Inspectors Z.C., Eric Murberg, and William Terpstra
26 have filed Use of Force Reports.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

This Motion is based on the government’s failure to timely produce *Brady* and *Henthorn* materials.

DATED: January 5, 2026

_____/s/_____
Katherine McBroom
Attorney for JONATHAN
REDONDO-ROSALES

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

On August 2, 2025, Defendant Jonathan Redondo-Rosales (“Mr. Redondo-Rosales”) was arrested outside of the Metropolitan Detention Center in Los Angeles based on Department of Homeland Security (“DHS”) Federal Protection Service (“FPS”) Inspector Z.C.’s allegations of assault. Inspector Z.C. claims that Mr. Redondo-Rosales struck him in the face with a closed fist. Video evidence demonstrates otherwise. In fact, video evidence confirms that, after an unmarked FPS vehicle struck Mr. Redondo-Rosales, Inspector Z.C. pursued Mr. Redondo-Rosales, shoving him to the pavement. Thereafter, as Mr. Redondo-Rosales attempted to get to his feet, FPS Inspector William Terpstra tackled Mr. Redondo-Rosales from behind, violently slamming him into the pavement. Then, as multiple officers pinned Mr. Redondo-Rosales to the ground, FPS Inspector Eric Murberg pepper sprayed Mr. Redondo-Rosales in the face. Mr. Redondo-Rosales suffered multiple injuries. Following the arrest, Inspectors Z.C., Terpstra, and Murberg filed Officer Use of Force reports and gave recorded statements to justify their acts of excessive force.

On October 27, 2025, the defense learned, independently, that complaining witness, Inspector Z.C., has a criminal history, including a 2021 assault conviction. Additionally, the defense learned that FPS, Inspector Z.C.’s employer, claims to be unaware of his criminal history and that Inspector Z.C. concealed his criminal history from the government when interviewed by the United States Attorney’s Office (“USAO”) in a related case where he alleged assaulted by a protestor.

The defense has repeatedly requested *Brady* and *Henthorn* materials related to Inspectors Z.C., Terpstra, and Murberg. Specifically, the defense requested complete personnel records, complaints for excessive force and/or false reporting, and disciplinary actions suffered for excessive force and/or false reporting for all three officers. The defense further requested the number of Officer Use of Force reports filed by each officer since January 2025. Finally, as to Inspector Z.C, individually, the

1 defense requested the identities of the individuals at the USAO to whom Inspector
2 Z.C. made misrepresentations about his criminal history as well as discovery related to
3 his misrepresentations to FPS in the course of this investigation and in order to secure
4 employment with FPS. The government refuses to provide the requested discovery on
5 the basis that it has complied with its duties under *Brady* or *Henthorn*.

6 II. RELEVANT FACTS

7 On August 2, 2025, Mr. Redondo-Rosales and Ashleigh Brown (“Ms. Brown”)
8 were arrested by Department of Homeland Security (“DHS”), Federal Protective
9 Services Inspectors (“FPSs”) on Alameda Street in front of the entrance to the Edward
10 Roybal Federal Building. FPS Inspector Z.C., the alleged victim, claims that both Mr.
11 Redondo-Rosales and Ms. Brown intentionally struck him. On August 4, 2025, in case
12 2:25-mj-04835, Mr. Redondo-Rosales and Ms. Brown were charged as co-
13 Defendants, each charged with felony violations of 18 U.S.C. § 111(a)(1). Both were
14 arraigned on August 5, 2025.

15 On August 15, 2025, the government filed an Information against Mr.
16 Redondo-Rosales alleging a misdemeanor violation of 18 U.S.C. § 111(a)(1). And on
17 August 26, 2025, the government filed a separate Information against Ms. Brown
18 alleging a misdemeanor violation of 18 U.S.C. § 111(a)(1) in Case No. 2:25-cr-00701.
19 The government dismissed the case against Ms. Brown on October 28, 2025. Mr.
20 Redondo-Rosales’ matter is scheduled for trial on February 3, 2026.

21 Defense counsel has made numerous requests for *Brady* and *Henthorn* materials
22 concerning the following witnesses: DHS FPS Inspectors Z.C., Eric Murberg, and
23 William Terpstra. Mr. Redondo-Rosales claims these officers were not acting lawfully
24 before and during the alleged incident and used excessive force in apprehending him,
25 causing injury. Video evidence first shows Mr. Redondo-Rosales being struck by an
26 FPS unmarked vehicle while he stands in front of the vehicle on the street. After the
27 car strikes Mr. Redondo-Rosales, multiple officers, including Inspector Z.C., rush
28 him. As he backs away from the officers, Inspector Z.C. shoves Mr. Redondo-Rosales

1 causing him to fall to the ground. During this encounter, a hat which Mr. Redondo-
2 Rosales holds in his left hand makes contact with Inspector Z.C., who is wearing a
3 helmet, face shield, and protective gear. When Mr. Redondo-Rosales attempted to get
4 back on his feet, Inspector Terpstra bear hugged Mr. Redondo-Rosales from behind
5 and threw him to the ground a second time causing the side of Mr. Redondo-Rosales'
6 head to slam into the pavement. Thereafter, as multiple officers pinned Mr. Redondo-
7 Rosales to the ground, Inspector Murberg pepper sprayed Mr. Redondo-Rosales in
8 this face.

9 Mr. Redondo-Rosales sustained multiple injuries consistent with the officers'
10 use of excessive force. Each officer filed an Officer Use of Force report following the
11 incident claiming that Mr. Redondo-Rosales' assault upon Inspector Z.C. led to his
12 violent takedown and detention. Video evidence shows otherwise.

13 On October 23, 2025, the defense requested, via email, *Brady* and *Henthorn*
14 discovery related to DHS FPS Inspectors Z.C., Eric Murberg, and William Terpstra.
15 Specifically, defense counsel requested:

- 16 - Any and all complaints (whether by civilians or law enforcement) alleging excess
17 force, regardless of the outcome;
- 18 - Any and all complaints (whether by civilians or law enforcement) alleging false
19 reporting regardless of the outcome.
- 20 - Any and all acts of moral turpitude including arrests for misdemeanor acts of
21 moral turpitude.
- 22 - Any and all complaints and/or write ups for over billing and/or over reporting
23 work hours.
- 24 - Any disciplinary actions suffered for use of excessive force.
- 25 - Any disciplinary actions suffered for false reporting.
- 26 - Any disciplinary actions suffered for overbilling/ over reporting time.
- 27 - The number of times since January 2025 until the present, each has filed an
28 Officers Use of Force Report.

1 On October 27, 2025, Special AUSA Robert Quealy responded as follows:
2 “The government does not have any Brady or Henthorn materials responsive to your
3 request for our current intended witnesses.” The defense responded, via email,
4 inquiring as to what steps the government took to confirm that none of the materials
5 requested exist.

6 The same day, October 27, 2025, the defense learned, independently, that
7 complaining witness FPS Inspector Z.C. has a criminal history including:

- 8 (1) a June 17, 2021 conviction for harassment in violation of Pennsylvania
9 Statute § 18.2709(a)(1)¹, which falls within the criminal chapter for Assault²;
10 (2) a August 31, 2014 arrest for disorderly conduct, in violation of Florida Statute
11 § 509.143; and
12 (3) a November 4, 2013 conviction for driving under the influence, in violation
13 of Florida Statute § 316193(1).

14 Additionally, on October 28, 2025, the defense learned that Inspector Z.C. lied to the
15 government concerning his criminal history. In the matter of *United States v.*
16 *Ashliegh Brown*, Case No. 2:25-cr-00701-FMO, the government filed a non-
17 opposition to Ms. Brown’s motion to compel the complete personnel files of the
18 involved officers, including Inspector Z.C. (Docket 87), and a declaration by Assistant
19 United States Attorney Clifford Mpare in support thereof. Mr. Mpare’s declaration
20 states:

- 21 (1) On or about September 30, 2025, Mr. Mpare’s “colleagues at the USAO”
22 asked Inspector Z.C. “candid questions” in anticipation of calling him at trial.”

23 _____
24 ¹ “A person commits the crime of harassment when, with intent to harass, annoy or
25 alarm another, the person: (1) strikes, shoves, kicks or otherwise subjects the other
26 person to physical contact, or attempts or threatens to do the same[.]” 18 Pa.C.S.A. §
27 2709(a)(1).

28 ²See Chapter 27, Assault
<https://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/18/00.027.001.000..HTM> (last
accessed on November 22, 2025).

1 Inspector Z.C. disclosed his 2013 DUI conviction and his 2014 arrest for
2 disorderly conduct only.

3 (2) On October 14, 2025, the government filed a declaration, pursuant to Judge
4 Olguin’s Order, stating that the government had complied with its *Henthorn*
5 obligations and had no information to disclose.

6 (3) On October 26, 2025, Mr. Mpare’s colleagues spoke with Inspector Z.C. who
7 confirmed that the information relating to the 2021 assault conviction
8 “appeared to refer to him.”

9 (4) The FPS Attorney, Cecelia Green, claims that FPS had no knowledge of
10 Inspector Z.C.’s 2021 assault conviction and hence did not disclose it.

11 Based on AUSA’s Mpare’s declaration, it appears that, in addition to lying to
12 unidentified individuals at the USAO during trial preparation, Inspector Z.C.
13 concealed his criminal record from DHS and FPS when seeking employment and
14 during the investigation of the Ashleigh Brown matter.

15 Accordingly, on October 30, 2025, the defense sent an email following up on
16 the October 27, 2025 request that the government explain the steps taken to verify that
17 the government did not have any information to disclose pursuant to *Brady* or
18 *Henthorn*, including misconduct and acts of moral turpitude. The government
19 responded that it would take several days to respond.

20 On November 5, 2025, Special AUSA Quealy emailed defense counsel that,
21 since informing the defense of the lack of *Henthorn* materials, he learned that
22 Inspector Z.C. has a criminal record, that the government no longer intends to call
23 Inspector Z.C. as a witness, and the government would be “providing a more detailed
24 response to [defense’s] outstanding questions later today.” The same day, defense
25 counsel informed Special AUSA Quealy that she would be calling Inspector Z.C. as a
26 witness and requested information as to whether Inspector Z.C. disclosed his criminal
27 record to DHS and renewed her request for materials responsive to the October 23,
28 2025 discovery demand. Special AUSA Quealy responded, “We have nothing more to

1 say than what has been disclosed in the public record in United States v. Ashleigh
2 Brown, 2:25-cr-00701, Dkt. 87.”

3 The government is well aware of the defense’s position in this case: that
4 Inspectors Z.C., Eric Murberg, and William Terpstra were not acting within their
5 lawful duties and used excessive force, and, after the fact, accused Mr. Redondo-
6 Rosales of assault in order to justify their misconduct.

7 The fact that Inspector Z.C. lied to the USAO and concealed his criminal
8 history from his employer, FPS, is relevant to his credibility. Accordingly, on
9 November 6, 2025, in addition to the materials requested in defense counsel’s October
10 23, 2025 email, defense counsel requested the personnel files of Inspectors Z.C., Eric
11 Murberg, William Terpstra; the names of the “colleagues” referenced in AUSA
12 Mpare’s declaration; and information concerning any federal agents to whom
13 Inspector Z.C. misrepresented his criminal history, including the agent whose affidavit
14 was attached to the Complaint in this matter, Agent Thomas Smith. The government
15 has not produced responsive materials and maintains that it has complied with its
16 *Brady* and *Henthorn* obligations.

17 On December 30, 2025, the defense emailed Special AUSA Quealy to meet and
18 confer concerning outstanding discovery. The Government reiterated that they have
19 complied with discovery obligations.

20 **III. ARGUMENT**

21 Mr. Redondo-Rosales’ right to this material information stems from the Due
22 Process Clause of the Fourteenth Amendment, and has been analyzed by Courts
23 applying *Brady*, *Giglio*, and its progeny, and incorporated into, and expanded upon
24 by, Federal Rule of Criminal Procedure 16.

25
26
27
28

1 **A. FPS Inspector Z.C.’s Criminal History And Attempts to Conceal**
2 **His Criminal History Are *Brady* and *Henthorn* Materials and are**
3 **Relevant to the Elements of the Charge, The Defense Of Self-**
4 **Defense, The Jury Instructions and Pending Defense Motions**

5 “The *Brady* rule is based on the requirement of due process.” *United States v.*
6 *Bagley*, 473 U.S. 667, 675 (1985). “Its purpose is not to displace the adversary system
7 as the primary means by which truth is uncovered, but to ensure that a miscarriage of
8 justice does not occur.” *Id.* “Impeachment evidence . . . is evidence favorable to an
9 accused . . . so that, if disclosed and used effectively, it may make the difference
10 between conviction and acquittal.” *Id.* “When the reliability of a given witness may
11 well be determinative of guilt or innocence, nondisclosure of evidence affecting
12 credibility falls within the general rule of *Brady*.” *Id.* at 677.

13 When the defense requests materials of testifying officers, the government must
14 “disclose information favorable to the defense that meets the appropriate standard of
15 materiality.” *Henthorn*, 931 F.2d at 31 (quoting *United States v. Cadet*, 727 F.2d 1453
16 (9th Cir. 1984)). “If the prosecution is uncertain about the materiality of information
17 within its possession, it may submit the information to the trial court for an *in camera*
18 inspection and evaluation.” *Id.*

19 Here, the fact that the government does not intend to call the complaining
20 witness at trial does not relieve the government of their obligations under *Brady* and
21 *Henthorn*. In their Motion in Limine #2 (Dkt. 33) , the government requests an order
22 precluding Mr. Redondo-Rosales from raising a self-defense claim. And in their
23 Motion in Limine #1 (Dkt. 32), they seek to admit Mr. Redondo-Rosales’ criminal
24 history to demonstrate his propensity for violence should he claim self-defense or
25 argue that any touching was unintentional. To be clear, the government wants to
26 preclude Mr. Redondo-Rosales from asserting self-defense against a law enforcement
27 officer with an assault conviction which he concealed from FPS and the USAO. Now
28 they seek to remove this witness from their case altogether to skirt discovery
 obligations.

1 Mr. Redondo-Rosales is entitled to learn the identities of the individuals at the
2 USAO (referenced in AUSA Mpare’s declaration) to whom Inspector Z.C. made
3 misrepresentations. These are clearly impeachment witnesses who can attest that,
4 during an active investigation of Mr. Redondo-Rosales’ former co-defendant
5 involving the same charge, Inspector Z.C. failed to disclose that he recently suffered
6 an assault conviction. Further, Mr. Redondo-Rosales is entitled to learn whether
7 Inspector Z.C. misrepresented his criminal history to FPS when seeking employment
8 and/or during the course of this investigation. Not only is Inspector Z.C.’s criminal
9 history *Brady* and *Henthorn* material, his history of committing assault as well as his
10 dishonesty concerning the prior assault directly supports multiple defense theories.
11 Issues of self-defense and excessive force are at play in this case. Information
12 concerning Inspector Z.C.’s recent criminal assault conviction and his recent efforts to
13 conceal the assault conviction are relevant to those issues.

14 **B. The Personnel File of FPS Inspector Z.C. Must Be Disclosed**

15 In addition to his criminal record, the government should have produced
16 Inspector Z.C.’s complete personnel file. Defense counsel and the Court should have
17 had an opportunity to review any information FPS has about Inspector Z.C.’s assault
18 history, as well as the agency’s knowledge about Inspector’s Z.C.’s performance
19 while on probation or supervised release (if applicable). Further, the absence of
20 information about Inspector Z.C.’s criminal record in his personnel file is *Brady*
21 evidence. For instance, if FPS did not know about Z.C.’s criminal history, any
22 concealment of his arrest and conviction history would be evidence of dishonesty and
23 thus have impeachment value. If Inspector Z.C. minimized or left out information
24 about his arrests or convictions, that, too, could be *Brady*.

25
26
27
28

1 **C. The Government Should be Required to Produce Complete**
2 **Personnel Files for Inspectors Z.C., William Terpstra, and Brian**
3 **Murberg**

4 The government’s affirmative obligation to learn of *Brady* evidence extends to
5 “information known to other agents of the government” of which the prosecutor did
6 “not know but could have learned,” including “information held by subordinates such
7 as investigating police officers.” *United States v. Cano*, 934 F.3d 1002, 1023 (9th Cir.
8 2019). Furthermore, the prosecution is presumed and “deemed to have knowledge of
9 and access to anything in the possession, custody or control of any federal agency
10 participating in the same investigation of the defendant.” *United States v. Bryan*, 868
11 F.2d 1032, 1036 (9th Cir. 1989). A *Brady* violation occurs “when the government fails
12 to turn over even evidence that is known only to police investigators and not to the
13 prosecutor,” and an agency’s *Brady* violation will be imputed to the prosecution).
14 *Youngblood v. West Virginia*, 547 U.S. 867, 869-70 (2006) (per curiam). The
15 government’s *Brady* obligations are broader pre-verdict than on appeal. *United States*
16 *v. Bundy*, 968 F.3d 1019, 1033 (9th Cir. 2020) (“[T]he retrospective definition of
17 materiality is appropriate only in the context of appellate review; thus, trial
18 prosecutors must disclose favorable information without attempting to predict whether
19 its disclosure might affect the outcome of the trial.”) (citing *United States v. Safavian*,
20 233 F.R.D. 12, 16 (D.D.C. 2005) (“The question before trial is not whether the
21 government thinks that disclosure of the information or evidence . . . might change the
22 outcome of the trial going forward, but whether the evidence is favorable and
23 therefore must be disclosed.”)) (other citations omitted).

24 Here, the recorded statements of all three officers as well as their use of force
25 reports are contradicted by video evidence. Accordingly, the defense seeks discovery
26 concerning false reporting and use of excessive force related to these three officers.

27 The government seeks to skirt their *Brady/Henthorn* obligations by simply
28 eliminating Inspector Z.C. from their case in chief, and claims, without basis, that all
29 *Brady/Henthorn* materials have been disclosed. This is wrong. Inspector Z.C. is the

1 alleged victim. The defense has uncovered evidence that Inspector Z.C. lied to federal
2 agents about his criminal history. This is felonious conduct. 18 U.S.C. § 1001.
3 Accordingly, it is discoverable. *See* Fed. R. Evid. 608; *U.S. v. Price*, 556 F.3d 900 913
4 (9th Cir. 2009) (“Rule 608(b) permits impeachment . . . by specific acts that have not
5 resulted in a criminal conviction. . . Under Rule 608(b), ‘specific instances’ of a
6 witness's prior conduct *may* be admissible ‘in the discretion of the court’ for purposes
7 of impeachment in order to show a witness's ‘character for truthfulness or
8 untruthfulness.”); *U.S. v. Bruce*, 984 F.3d 884, 896-97 (9th Cir. 2021) (government
9 cannot avoid *Brady* discovery obligations to disclose evidence favorable to the
10 defense by not calling a witness at trial).

11 At this point, the government has abused any right to independently review
12 personnel files and determine what constitutes *Brady* or *Henthorn* material subject to
13 disclosure. The Court should therefore require the government to immediately
14 produce the complete personnel files of all three FPS officers. Only then can the
15 defense be confident that the government has not withheld other discoverable
16 evidence before trial.

17 **IV. CONCLUSION**

18 For the foregoing reasons, Mr. Redondo-Rosales requests that the Court compel
19 the government to produce: (1) the identities of the individuals at the USAO,
20 referenced in AUSA Mpare’s declaration in the related matter, to whom Inspector
21 Z.C. made misrepresentations concerning his criminal history during trial preparation
22 in the related case; (2) discovery related to Inspector Z.C. misrepresentations to FPS
23 concerning his criminal history including to secure employment; and (3) discovery
24 related to whether Inspector Z.C. made misrepresentations to any federal agent,
25 including with FPS, concerning his criminal history.

26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF KATHERINE McBROOM

1. I am an attorney licensed to practice law in California State and Federal courts, am a member of the CJA Panel for the Central District of California and I have been appointed to represent Defendant Jonathan Redondo-Rosales (“Mr. Redondo-Rosales”).

2. On August 2, 2025, Mr. Redondo-Rosales and Ashleigh Brown (“Ms. Brown”) were arrested by Department of Homeland Security (“DHS”), Federal Protective Services Inspectors (“FPSs”) on Alameda Street in front of the entrance to the Edward Roybal Federal Building. FPS Inspector Z.C., the alleged victim, claims that both Mr. Redondo-Rosales and Ms. Brown intentionally struck him.

3. On August 4, 2025, in case 2:25-mj-04835, Mr. Redondo-Rosales and Ms. Brown were charged as co-Defendants, each charged with felony violations of 18 U.S.C. § 111(a)(1). Both were arraigned on August 5, 2025.

4. On August 15, 2025, the government filed an Information against Mr. Redondo-Rosales alleging a misdemeanor violation of 18 U.S.C. § 111(a)(1).

5. And on August 26, 2025, the government filed a separate Information against Ms. Brown alleging a misdemeanor violation of 18 U.S.C. § 111(a)(1) in Case No. 2:25-cr-00701. The government dismissed the case against Ms. Brown on October 28, 2025.

6. Mr. Redondo-Rosales’ matter is scheduled for trial on February 3, 2026.

7. I have made numerous requests for *Brady* and *Henthorn* materials concerning the following witnesses: DHS FPS Inspectors Z.C., Eric Murberg, and William Terpstra. The defense maintains these officers were not acting lawfully before and during the alleged incident and used excessive force in apprehending Mr. Redondo-Rosales, causing injury.

8. Video evidence shows Mr. Redondo-Rosales being struck by an FPS unmarked vehicle while he stands in front of the vehicle on the street. After the car strikes Mr. Redondo-Rosales, multiple officers, including Inspector Z.C., rush him. As he backs away from the officers, Inspector Z.C. shoves Mr. Redondo-Rosales causing him to fall

1 to the ground. During this encounter, a hat which Mr. Redondo-Rosales holds in his left
2 hand makes contact with Inspector Z.C., who is wearing a helmet, face shield, and
3 protective gear. When Mr. Redondo-Rosales attempted to get back on his feet, Inspector
4 Terpstra bear hugged Mr. Redondo-Rosales from behind and threw him to the ground
5 a second time causing the side of Mr. Redondo-Rosales' head to slam into the pavement.
6 Thereafter, as multiple officers pinned Mr. Redondo-Rosales to the ground, Inspector
7 Murberg pepper sprayed Mr. Redondo-Rosales in this face. Lodged with the Court as
8 Exhibits A and B are true and correct copies of videos recorded by Stephen Nunez, an
9 eyewitness at the scene.

10 9. Mr. Redondo-Rosales sustained multiple injuries consistent with the officers' use
11 of excessive force.

12 10. Each officer filed an Officer Use of Force report following the incident claiming
13 that Mr. Redondo-Rosales' assault upon Inspector Z.C. led to his violent takedown and
14 detention. Video evidence shows otherwise.

15 11. On October 23, 2025, I requested, via email, *Brady* and *Henthorn* discovery
16 related to DHS FPS Inspectors Z.C., Eric Murberg, and William Terpstra. Specifically,
17 I requested:

- 18 - Any and all complaints (whether by civilians or law enforcement) alleging excess
19 force, regardless of the outcome;
- 20 - Any and all complaints (whether by civilians or law enforcement) alleging false
21 reporting regardless of the outcome.
- 22 - Any and all acts of moral turpitude including arrests for misdemeanor acts of
23 moral turpitude.
- 24 - Any and all complaints and/or write ups for over billing and/or over reporting
25 work hours.
- 26 - Any disciplinary actions suffered for use of excessive force.
- 27 - Any disciplinary actions suffered for false reporting.
- 28 - Any disciplinary actions suffered for overbilling/ over reporting time.

- 1 - The number of times since January 2025 until the present, each has filed an
2 Officers Use of Force Report.

3 Attached here as Exhibit C is a true and correct copy of the defense’s October 23, 2025
4 discovery request.

5 12. On October 27, 2025, Special AUSA Robert Quealy responded as follows: “The
6 government does not have any Brady or Henthorn materials responsive to your request
7 for our current intended witnesses.” I, via email, inquired as to what steps the
8 government took to confirm that none of the materials requested exist. Attached as
9 Exhibit D is a true and correct copy of the October 27, 2025 email exchange between
10 Special AUSA Quealy and me.

11 13. The same day, October 27, 2025, I learned, independently, that complaining
12 witness FPS Inspector Z.C. has a criminal history including:

- 13 - a June 17, 2021 conviction for harassment in violation of Pennsylvania Statute §
14 18.2709(a)(1), which falls within the criminal chapter for Assault;
15 - a August 31, 2014 arrest for disorderly conduct, in violation of Florida Statute §
16 509.143; and
17 - a November 4, 2013 conviction for driving under the influence, in violation of
18 Florida Statute § 316193(1).

19 14. Additionally, on October 28, 2025, I learned that Inspector Z.C. lied to the
20 government concerning his criminal history. In the matter of *United States v. Ashliegh*
21 *Brown*, Case No. 2:25-cr-00701-FMO, the government filed a non-opposition to Ms.
22 Brown’s motion to compel the complete personnel files of the involved officers,
23 including Inspector Z.C. (Docket 87), and a declaration by Assistant United States
24 Attorney Clifford Mpare in support thereof. Mr. Mpare’s declaration states:

- 25 - On or about September 30, 2025, Mr. Mpare’s “colleagues at the USAO” asked
26 Inspector Z.C. “candid questions” in anticipation of calling him at trial.”
27 Inspector Z.C. disclosed his 2013 DUI conviction and his 2014 arrest for
28 disorderly conduct only.

- 1 - On October 14, 2025, the government filed a declaration, pursuant to Judge
2 Olguin’s Order, stating that the government had complied with its *Henthorn*
3 obligations and had no information to disclose.
- 4 - On October 26, 2025, Mr. Mpare’s colleagues spoke with Inspector Z.C. who
5 confirmed that the information relating to the 2021 assault conviction “appeared
6 to refer to him.”
- 7 - The FPS Attorney, Cecelia Green, claims that FPS had no knowledge of Inspector
8 Z.C.’s 2021 assault conviction and hence did not disclose it.

9 Attached here as Exhibit E is a true and correct copy of the Declaration of Mpare,
10 attached to the government’s non-opposition to Ms. Brown’s motion to compel
11 complete personnel records in Case No. 2:25-cr-00701-FMO.

12 15. Based on AUSA’s Mpare’s declaration, it appears that, in addition to lying to
13 unidentified individuals at the USAO during trial preparation, Inspector Z.C. concealed
14 his criminal record from DHS and FPS when seeking employment and during the
15 investigation of the Ashleigh Brown matter.

16 16. Accordingly, on October 30, 2025, I sent an email following up on the October
17 27, 2025 request that the government explain the steps taken to verify that the
18 government did not have any information to disclose pursuant to *Brady* or *Henthorn*,
19 including misconduct and acts of moral turpitude. The government responded that it
20 would take several days to respond. Attached here as Exhibit F is a true and correct
21 copy of the October 30, 2025 email exchange.

22 17. On November 5, 2025, Special AUSA Quealy emailed me that, since informing
23 the defense of the lack of *Henthorn* materials, he learned that Inspector Z.C. has a
24 criminal record, that the government no longer intends to call Inspector Z.C. as a
25 witness, and the government would be “providing a more detailed response to
26 [defense’s] outstanding questions later today.” Attached here as Exhibit G is true and
27 correct copy of Special AUSA Quealy’s November 5, 2025 email.

28

1 18. The same day, Special AUSA Quealy sent an email stating the government will
2 continue to comply with its obligations under *Giglio/Henthorn* and *Brady*. Attached
3 here as Exhibit H is a true and correct copy of Special AUSA's Quealy's second email
4 of November 5, 2025.

5 19. On November 5, 2025, I responded that the defense continued to seek production
6 of prior complaints against all Inspectors involved in the incident as well as use of force
7 reports filed. Additionally, I inquired whether Inspector Z.C. had disclosed his criminal
8 record to DHS. On November 6, 2025, Special AUSA Quealy responded, "We have
9 nothing more to say than what has been disclosed in the public record in United States
10 v. Ashleigh Brown, 2:25-cr-00701, Dkt. 87." Attached here as Exhibit I is a true and
11 correct copy of my November 5, 2025 to November 6, 2025 email exchanges with
12 Special AUSA Quealy.

13 20. The government is well aware of the defense's position in this case: that
14 Inspectors Z.C., Eric Murberg, and William Terpstra were not acting within their lawful
15 duties and used excessive force, and, after the fact, accused Mr. Redondo-Rosales of
16 assault in order to justify their misconduct.

17 21. The fact that Inspector Z.C. lied to the USAO and concealed his criminal history
18 from his employer, FPS, is relevant to his credibility. Accordingly, on November 6,
19 2025, in addition to the materials requested in defense counsel's October 23, 2025
20 email, defense counsel requested the personnel files of Inspectors Z.C., Eric Murberg,
21 William Terpstra; the names of the "colleagues" referenced in AUSA Mpare's
22 declaration; and information concerning any federal agents to whom Inspector Z.C.
23 misrepresented his criminal history, including the agent whose affidavit was attached
24 to the Complaint in this matter, Agent Thomas Smith. This email is included in Exhibit
25 I, the November 5 to 6, 2025 communications between Special AUSA Quealy and me.

26 22. The government has not produced responsive materials and maintains that it has
27 complied with its *Brady* and *Henthorn* obligations.
28

1 23. On December 30, 2025, I emailed Special AUSA Quealy to meet and confer
2 concerning outstanding discovery. The Government reiterated that they have complied
3 with discovery obligations. Attached here as Exhibit J is a true and correct copy of my
4 December 30, 2025 email exchange with Special AUSA Quealy.

5 I declare under penalty of perjury that the foregoing is true and correct to the best
6 of my knowledge. Executed this 8th day of January 2026, at Beverly Hills, California.

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/
KATHERINE McBROOM