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 12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

No. 2:25-cr-00780-SVW

16 Plaintiff,

GOVERNMENT'S SUPPLEMENTAL TRIAL
 MEMORANDUM

17 v.

18 CYNTHIA RAYGOZA,
 19 aka "Cynthia Curriel Curriel,"
 ASHLEIGH BROWN,
 20 aka "ice_out_ofla,"
 aka "corn_maiden_design," and
 21 SANDRA CARMONA SAMAME,
 aka "Sandra Karmona,"
 22 aka "Sandra Carolina Carmona
 Samame,"
 23 aka "Sandra Carmona Samane,"

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

24 Defendants.

25
 26 Plaintiff United States of America, by and through its counsel
 27 of record, Assistant United States Attorneys Clifford D. Mpare and
 28

1 **STATEMENT OF FACTS**

2 During trial on February 25, 2026, several issues were raised:

- 3 1. Counsel for defendant Raygoza stated Raygoza's intent to
4 file a supplemental jury instruction regarding the
5 definition of "covered person" under 18 U.S.C. § 119(a)
6 (the anti-doxxing statute).
7 2. Counsel for defendant Brown stated her intent to have a
8 private investigator testify regarding (1) the fact that
9 the windows of R.H.'s government vehicle are tinted; and
10 (2) the fact that R.H.'s home address could be found online
11 before August 28, 2025.

12 **ARGUMENT**

13 For the reasons explained below, the Court should (1) reject
14 defendant Raygoza's supplemental jury instruction, and (2) preclude
15 defendant Brown's investigator from testifying about those topics at
16 trial.

17 **I. THE COURT SHOULD REJECT RAYGOZA'S SUPPLEMENTAL JURY INSTRUCTION**

18 At the end of the trial day on February 25, 2026, counsel for
19 Raygoza stated he anticipated filing a proposed supplemental jury
20 instruction that explained that a "covered person" under the anti-
21 doxxing statute means a person who is "engaged in" his official
22 duties. Per Raygoza, since R.H. was off-duty when defendants
23 conspired to dox him, he is not considered a "covered person." This
24 is contrary to the law and plain language of the statute.

25 The anti-doxxing statute, 18 U.S.C. § 119(a), makes it a crime
26 to knowingly make restricted information about a "covered person" (or
27 a member of the immediate family of that covered person) publicly
28 available. The term "covered person" is defined as, among other

1 things, "an individual designated in section 1114." Section 1114 in
2 turn protects "any officer or employee of the United States or of any
3 agency in any branch of the United States Government (including any
4 member of the uniformed services) **while such officer or employee is**
5 **engaged in or on account of the performance of official duties."** 18
6 U.S.C. § 1114(a) (emphasis added). An ICE officer who is doxxed "on
7 account of the performance of [his] official duties," like R.H, is a
8 covered person. There is no dispute that defendants followed R.H.
9 home and told strangers on the Internet where he lived precisely
10 because he is an ICE officer and because they opposed ICE enforcement
11 of immigration laws (i.e., on account of the performance of his
12 official duties). Defendant Raygoza's attempt to narrow the language
13 to only federal officers engaged in their duties is improper, reads
14 the entire clause "on account of the performance of official duties"
15 out of the law, and would defang the anti-doxxing statute entirely.
16 It does not make sense that a federal officer can only be doxxed
17 while on duty - what matters is the nexus between the doxxing and his
18 official duties, as is illuminated by the other definitions of
19 "covered person" under 18 U.S.C. § 119(b)(2) (e.g., "a State or local
20 officer or employee whose restricted personal information is made
21 publicly available because of the participation in, or assistance
22 provided to, a Federal criminal investigation by that officer or
23 employee").

24 The language "on account of the performance of official duties"
25 appears in numerous other statutes governing crimes against federal
26 officials. For example, it appears in 18 U.S.C. § 115(a)(1) which
27 outlaws, among other things, the assault, kidnap, or murder of a
28 "United States official, a United States judge, a Federal law

1 enforcement officer," or an official defined in § 1114(a). Under
2 defendant Raygoza's improperly narrow reading, this law would apply
3 only to the murder of one of those officials while they were at work.
4 Cf. United States v. DePape, 2024 WL 1421264 (N.D. Cal. 2024) (Order
5 on motion for new trial for the attempted kidnapping of Congresswoman
6 and Speaker Emerita of the U.S. House of Representatives Nancy Pelosi
7 and the assault on her husband).

8 The Court should reject defendant Raygoza's supplemental
9 instruction regarding a "covered person."¹

10 **II. DEFENDANT BROWN'S INVESTIGATOR SHOULD BE PRECLUDED FROM**
11 **TESTIFYING**

12 Defendant Brown's investigator should be precluded from
13 testifying because both topics of anticipated testimony are
14 irrelevant, duplicative, would only serve to confuse the jury, and
15 waste time. See Fed. R. Evid. 401, 403.

16 First, there is no dispute that R.H. was driving a government
17 car home from the federal building that had tinted windows. The
18 defense elicited testimony from R.H. at trial that the windows of his
19 government car were all tinted and it was not possible to see into
20 the vehicle. The government has not, and will not, argue that
21 defendants knew during their drive from the federal building to
22

23 ¹ Notably, it does not appear any other defendant has requested
24 an instruction on the definition of "covered person," and the parties
25 jointly submitted jury instructions several days before the pretrial
26 conference in this case. If the Court is inclined to give an
27 instruction on "covered person," it should track the exact language
28 of section 1114 and define it as: "any officer or employee of the
United States or of any agency in any branch of the United States
Government (including any member of the uniformed services) while
such officer or employee is engaged in or on account of the
performance of official duties, or any person assisting such an
officer or employee in the performance of such duties or on account
of that assistance."

1 Baldwin Park that they were following R.H. to his home. Indeed, the
2 government's opening statement acknowledged that defendants
3 speculated they were following R.H.'s vehicle to an ICE enforcement
4 action. Defendants' initial speculation aside, defendants ultimately
5 realized they had followed R.H. to his home, as evidenced by multiple
6 comments caught on video. See, e.g., Government Ex. 3 at 1:06 - 1:11
7 (Brown: "That's the ICE agent - this is where he lives apparently.").
8 The government has sufficient evidence to convict defendants even
9 assuming they initially believed R.H. was driving to an ICE
10 enforcement action. There is no reason to call a witness to testify
11 about R.H.'s tinted windows.

12 Second, the Court has already found irrelevant the
13 investigator's other area of testimony: that R.H.'s personal address
14 in Baldwin Park could be found online before August 28, 2025. The
15 Court denied defendant's motion to dismiss the indictment (dkt. 93),
16 where Brown argued that the anti-doxxing statute "does not apply to
17 information that is already publicly available" and "the indictment
18 must be dismissed because it does not allege that [R.H.]'s home
19 address was not publicly available." (Dkt. 93 at 1, 3.) By denying
20 defendant's motion to dismiss, the Court has already found that this
21 legal argument carries no weight. As explained in the government's
22 opposition to defendant's motion to dismiss, Brown's position is
23 inconsistent with the plain language of the statute, which says "make
24 publicly available," not "make publicly available for the first
25 time." 18 U.S.C. § 119(a); see also Am. Farm Bureau Fed'n v. EPA, 836
26 F.3d 963, 972 (8th Cir. 2016) ("There is an important distinction
27 between the mere ability to access information and the likelihood of
28 actual public focus on that information.") (cleaned up) (emphasis in

1 original); Vangheluwe v. Got News, LLC, 365 F. Supp. 3d 850, 858
2 (E.D. Mich. 2019) (defining doxxing as “using the Internet to source
3 out and collect someone’s personal and private information and then
4 publicly releasing that information online”) (emphasis added).
5 Introducing this testimony at trial would thus inject irrelevant
6 evidence that would confuse the jury and fly in the face of the jury
7 instructions.

8 The Court, therefore, should preclude defendant Brown’s
9 investigator from testifying at trial.

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