



1 JOSEPH T. MCNALLY  
 Acting United States Attorney  
 2 LINDSEY GREER DOTSON  
 Assistant United States Attorney  
 3 Chief, Criminal Division  
 BRETT A. SAGEL (Cal. Bar No. 243918)  
 4 Assistant United States Attorney  
 Chief, Corporate and Securities Fraud Strike Force  
 5 JENNA G. WILLIAMS (Cal. Bar No. 307975)  
 NISHA CHANDRAN (Cal. Bar No. 325345)  
 6 Assistant United States Attorney  
 Corporate and Securities Fraud Strike Force  
 7 1100 United States Courthouse  
 312 North Spring Street  
 8 Los Angeles, California 90012  
 Telephone: (213) 894-2429  
 9 Facsimile: (213) 894-0141  
 Email: Nisha.Chandran@usdoj.gov

10 GLENN S. LEON  
 Chief, Fraud Section  
 Criminal Division, U.S. Department of Justice  
 11 THEODORE M. KNELLER (D.C. Bar No. 978680)  
 ADAM L.D. STEMPEL (D.C. Bar No. 1615015)  
 12 Trial Attorneys, Fraud Section  
 Criminal Division, U.S. Department of Justice  
 13 1400 New York Avenue, NW  
 Washington, DC 20530  
 14 Telephone: (202) 514-5799  
 Facsimile: (202) 514-3708  
 15 Email: Theodore.Kneller@usdoj.gov

16 Attorneys for Plaintiff  
 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT  
 18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,  
 20  
 21 Plaintiff,  
 22  
 23 v.  
 24 IBRAHIM AMEEN ALHUSSEINI,  
 25 Defendant.

No. CR 25-00042-SVW

SECOND STIPULATION AND REQUEST TO  
 MODIFY THE TERMS AND CONDITIONS OF  
 DEFENDANT'S PRETRIAL RELEASE

26  
 27 Plaintiff United States of America (the "government"), by and  
 28 through its counsel of record, the United States Attorney's Office

1 for the Central District of California and the Fraud Section of the  
2 U.S. Department of Justice; and defendant IBRAHIM AMEEN ALHUSSEINI,  
3 by and through his counsel of record, Naeun Rim, Randy Grossman,  
4 Andrew Beshai (collectively with the government, the "parties")  
5 hereby stipulate to, and request the Court issue, an order modifying  
6 the terms and conditions of defendant's pretrial release as follows  
7 so defendant may engage in undercover activities:

8 1. The Information in this case was filed under seal on  
9 January 21, 2025. On January 22, 2025, defendant appeared before a  
10 judicial officer of the court in which the charges were pending.  
11 Trial is currently set to begin on March 18, 2025.

12 2. On February 10, 2025, the government filed a First  
13 Superseding Information and the parties simultaneously filed a plea  
14 agreement.

15 3. Pursuant to the plea agreement, defendant agrees to  
16 cooperate fully with the government, which may include acting in an  
17 undercover capacity if requested to do so by the government.

18 4. Based on defendant's proffers with the government, the  
19 government believes that defendant can provide proactive undercover  
20 cooperation against other targets of the government's investigation  
21 in Los Angeles County.

22 5. On February 24, 2025, based on the parties' stipulation,  
23 the Court issued an order to modify the terms and conditions of  
24 defendant's release as follows: (1) defendant's supervision by  
25 Pretrial Services was terminated; (2) defendant began supervision by  
26 agents of the FBI; (3) defendant no longer participated in the  
27 Location Monitoring Program; (4) at the direction of the government,  
28 defendant could contact Aspiration, including Joe Sanberg, Nate

1 Redmond, and any past or present employee or board member of  
2 Aspiration, and with any person that is directly involved in the  
3 charged conduct; and (5) all other terms of defendant's pretrial  
4 release remained in effect.

5 6. The government now believes that defendant can attempt to  
6 provide proactive undercover cooperation through communication  
7 without in-person meetings.

8 7. By this second stipulation, the parties now request that  
9 the Court order the terms and conditions of defendant's release (as  
10 previously modified by the Court's February 24, 2025 order) be  
11 modified as follows:

12 a. Defendant shall be supervised by Pretrial Services.

13 b. Defendant shall participate in the Location Monitoring  
14 Program. The Location Monitoring Restrictions shall include Location  
15 Monitoring with an ankle monitor at the discretion of the Supervising  
16 Agency. Defendant shall no longer be subject to a curfew.

17 c. Defendant shall no longer be required to avoid all  
18 contact, directly or indirectly (including by any electronic means)  
19 with Aspiration, including Joe Sanberg, Nate Redmond, and any past or  
20 present employee or board member of Aspiration, and with any person  
21 that is directly involved in the charged conduct.

22 d. Defendant shall no longer be subject to the  
23 requirement that he possess and use only those digital devices,  
24 screen usernames, email accounts, social media accounts, messaging  
25 applications and cloud storage accounts, as well as any passwords or  
26 passcodes for all such digital devices and accounts, that he  
27 disclosed to the Supervising Agency upon commencement of supervision.  
28 Defendant shall no longer be subject to the requirement that he agree

1 to submit to a search of his person and property, including digital  
2 devices, to determine compliance by the Supervising Agency.

3 e. Defendant's digital devices shall no longer be subject  
4 to monitoring by the Supervising Agency. Defendant shall no longer  
5 be required to comply with the rules and regulations of the Computer  
6 Monitoring Program.

7 f. All other terms of defendant's pretrial release shall  
8 remain in effect.

9 //

10 //

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 8. Pretrial Services has no objection to the requested  
2 modification and has indicated that it is willing to supervise  
3 defendant while he is cooperating given that the attempted  
4 cooperation will not involve in-person meetings.

5 9. At the conclusion of the attempted proactive cooperation,  
6 the government will move to reinstate defendant's original terms and  
7 conditions of defendant's pretrial release.

8 IT IS SO STIPULATED.

9 UNITED STATES ATTORNEY'S OFFICE  
10 FOR THE CENTRAL DISTRICT OF  
CALIFORNIA

11 JOSEPH T. MCNALLY  
12 Acting United States Attorney

13 GLENN S. LEON  
14 UNITED STATES DEPARTMENT OF JUSTICE  
Chief, Fraud Section  
Criminal Division

15 /s/ Nisha Chandran February 25, 2025

16 BRETT A. SAGEL  
17 JENNA G. WILLIAMS  
18 NISHA CHANDRAN  
Assistant United States Attorneys

Date

19 THEODORE M. KNELLER  
20 ADAM L.D. STEMPEL  
Trial Attorneys, Fraud Section  
Criminal Division

21 /s/ (per email auth. dated 2/25/25) February 25, 2025

22 NAEUN RIM  
23 RANDY GROSSMAN  
24 ANDREW BESHAI  
Attorney for Defendant  
25 IBRAHIM AMEEN ALHUSSEINI

Date

26  
27  
28