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10 Attorneys for Plaintiff
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

No. 2:25-cr-00780-SVW

14 Plaintiff,

REQUEST TO DISMISS WITHOUT
PREJUDICE COUNT TWO OF THE
INDICTMENT AGAINST ALL DEFENDANTS
PURSUANT TO FEDERAL RULE OF
CRIMINAL PROCEDURE 48(a)

15 v.

16 CYNTHIA RAYGOZA,
aka "Cynthia Curiel Curiel,"
17 ASHLEIGH BROWN,
aka "ice_out_ofla,"
18 aka "corn_maiden_design," and
SANDRA CARMONA SAMANE,
19 aka "Sandra Karmona,"
aka "Sandra Carolina Carmona
20 Samame,"
aka "Sandra Carmona Samame,"

21 Defendants.

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24 Pursuant to Federal Rule of Criminal Procedure 48(a), the United
25 States of America, by and through its counsel of record, the First
26 Assistant United States Attorney for the Central District of
27 California and Assistant United States Attorney Lauren E. Border,
28 hereby moves to dismiss without prejudice count two of the indictment

1 (dkt. 22) in the above-captioned case against defendants CYNTHIA
2 RAYGOZA, ASHLEIGH BROWN, and SANDRA CARMONA SAMANE ("defendants"),
3 charging defendants with Publicly Disclosing the Personal Information
4 of a Federal Agent, in violation of 18 U.S.C. § 119(a), 18 U.S.C.
5 § 2(a).

6 The United States moves to dismiss count two of the indictment
7 without prejudice against all defendants in the interests of justice
8 under Federal Criminal Rule 48(a), and therefore respectfully
9 requests that the Court grant its motion. Defendant SAMANE does not
10 oppose dismissal, whereas defendants RAYGOZA and BROWN do not
11 stipulate to dismissal.

12 Dated: January 12, 2026

Respectfully submitted,

13 TODD BLANCHE
14 Deputy Attorney General

15 BILAL A. ESSAYLI
16 First Assistant United States
17 Attorney

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

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 /s/
22 LAUREN E. BORDER
23 Assistant United States Attorney

24 Attorneys for Plaintiff
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