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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendants.

No. 2:25-cr-00780-SVW

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

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

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

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

Dated: January 12, 2026

Respectfully submitted,

TODD BLANCHE
Deputy Attorney General

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/s/
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