



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2025 Grand Jury

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.

CR 2:25-cr-00780-SVW

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy to
Publicly Disclose the Personal
Information of a Federal Agent; 18
U.S.C. § 119(a): Publicly
Disclosing the Personal
Information of a Federal Agent]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

1. Beginning on a date unknown to the Grand Jury, and
continuing until on or about August 28, 2025, in Los Angeles County,
within the Central District of California, defendants CYNTHIA RAYGOZA

1 also known as ("aka") "Cynthia Curiel Curiel" ("RAYGOZA"), ASHLEIGH
2 BROWN, aka "ice_out_ofla," aka "corn_maiden_design" ("BROWN"), and
3 SANDRA CARMONA SAMANE aka "Sandra Karmona," aka "Sandra Carolina
4 Carmona Samame," aka "Sandra Carmona Samame" ("SAMANE") (together,
5 "defendants") did knowingly and intentionally conspire with others
6 known and unknown to the Grand Jury to commit the offense of Publicly
7 Disclosing the Personal Information of a Federal Agent, in violation
8 of Title 18, United States Code, Section 119(a).

9 B. MANNER AND MEANS OF THE CONSPIRACY

10 2. The objects of the conspiracy were carried out, and were to
11 be carried out, in substance, as follows:

12 a. Defendants would follow a federal agent from the
13 Federal Building located at 300 North Los Angeles Street in Los
14 Angeles, California ("Federal Building") to his or her personal
15 residence;

16 b. Defendants would publicly disclose the personal
17 address of the federal agent they followed on social media, including
18 but not limited to the following Instagram accounts associated with
19 defendant BROWN:

20 i. "ice_out_ofla,"
21 ii. "defendmesoamericanculture," and
22 iii. "corn_maiden_design" (collectively, the
23 "Instagram Accounts");

24 c. Defendants would encourage viewers of their posts on
25 the above-referenced accounts, and others known and unknown to the
26 Grand Jury, to follow the federal agent to his or her personal
27 residence, in order to threaten, intimidate, and incite the
28 commission of a crime of violence against that federal agent.

1 C. OVERT ACTS

2 3. On or about August 28, 2025, in furtherance of the
3 conspiracy and to accomplish its objects, defendants, and others
4 known and unknown to the Grand Jury, committed various overt acts
5 within the Central District of California, and elsewhere, including,
6 but not limited to, the following:

7 Overt Act No. 1: Defendants entered defendant BROWN's car and
8 followed R.H., an employee of the United States Immigration and
9 Customs Enforcement, from his place of employment at the Federal
10 Building to his personal residence;

11 Overt Act No. 2: Defendants live-streamed, that is, posted a
12 live video, on the Instagram Accounts of them following R.H. from the
13 Federal Building to his personal residence;

14 Overt Act No. 3: Defendants provided directions as they were
15 following R.H. to his personal residence, and encouraged and incited
16 viewers of the live-stream to "share the live," "get it out," and
17 "share ICE is in Baldwin Park";

18 Overt Act No. 4: Once they arrived at R.H.'s personal
19 residence, defendants shouted to bystanders, while live-streaming on
20 the Instagram Accounts, that their "neighbor is ICE," "la migra lives
21 here," and "ICE lives on your street and you should know."

22 Overt Act No. 5: Defendants publicly disclosed on the
23 Instagram Accounts R.H.'s personal address and told viewers, "come on
24 down."

COUNT TWO

[18 U.S.C. § 119(a); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

On or about the August 28, 2025, in Los Angeles County, within the Central District of California, defendants CYNTHIA RAYGOZA also known as ("aka") "Cynthia Curiel Curiel" ("RAYGOZA"), ASHLEIGH BROWN, aka "ice_out_ofla," aka "corn_maiden_design" ("BROWN"), and SANDRA CARMONA SAMANE aka "Sandra Karmona," aka "Sandra Carolina Carmona Samame," aka "Sandra Carmona Samame," each aiding and abetting the other and others known and unknown to the Grand Jury, knowingly made publicly available the following restricted personal information about a covered person, namely, the home address of R.H., an employee of the United States Immigration and Customs Enforcement, with the intent to threaten, intimidate, and incite the commission of a crime of violence against that covered person, and with the intent and knowledge that the restricted personal information would be used to

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1 threaten, intimidate, and facilitate the commission of a crime of
2 violence against that covered person.

3
4 A TRUE BILL

5
6 /s/
7 Foreperson

8 BILAL A. ESSAYLI
9 Acting United States Attorney

10 JOSEPH T. MCNALLY
11 Assistant United States Attorney
12 Acting Chief, Criminal Division

13 

14 FRANCES S. LEWIS
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