



UNITED STATES DISTRICT COURT

for the

Central District of California

United States of America,

v.

JONATHAN RINDERKNECHT,

Defendant

Case No. 2:25-mj-06103-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the dates of January 1, 2025, through January 31, 2025, in the county of Los Angeles in the Central District of California, defendant JONATHAN RINDERKNECHT violated:

Code Section

18 U.S.C. § 844(f)(1)

*Offense Description*Destruction of Property by Means of
Fire

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/s/

Complainant's signature

William M. Schry, Special Agent, ATF

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: October 2, 2025*Judge's signature*City and state: Los Angeles, CaliforniaHon. Karen L. Stevenson, U.S. Magistrate Judge*Printed name and title*

AUSAs: Mark Williams, Matthew O'Brien, Laura Alexander, Danbee Kim

ATTACHMENT TO COMPLAINT

Offense Description:

Beginning on or about January 1, 2025, and continuing through on or about January 31, 2025, in Los Angeles County, within the Central District of California, defendant JONATHAN RINDERKNECHT, also known as “Jonathan Rinder” and “Jon Rinder” (“RINDERKNECHT”), maliciously damaged and destroyed, by means of fire, specifically, the fire known as the Lachman Fire and Palisades Fire, a building and other real or personal property in whole or in part owned or possessed by, or leased to, the United States, or any department or agency thereof, or any institution or organization receiving federal financial assistance. Specifically, RINDERKNECHT burned federal property within the Santa Monica Mountains National Recreation Area, as well as property owned by the Mountains Recreation and Conservation Authority and California State Parks, two institutions or organizations receiving federal financial assistance.

AFFIDAVIT

I, William M. Schry, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). I have been a Special Agent with ATF since 2009. As a Special Agent with ATF, I am authorized to investigate violations of the laws of the United States, and I have been involved with numerous criminal investigations involving violations of federal law. I am a law enforcement officer with authority to execute arrest and search warrants under the authority of the United States. See 18 U.S.C. § 3051.

2. As an ATF Special Agent, I have completed the Criminal Investigator Training Program and ATF Special Agent Basic Training at the Federal Law Enforcement Training Center in Glynco, Georgia, where I received training in the investigation of federal crimes involving firearms, narcotics, arson and explosives. My experience as a Special Agent with the ATF includes, but is not limited to, conducting physical surveillance, interviewing witnesses and subjects, executing search and arrest warrants, and obtaining and analyzing digital and social media content and communications. I am currently assigned to the Los Angeles Field Division, Arson and Explosives Group and am primarily responsible for the investigation of fire-related incidents. I have participated in numerous arrest

and seizure warrants involving a variety of offenses, including violations pertaining to arson and explosives.

3. I earned Certified Fire Investigator ("CFI") credentials from ATF and the International Association of Arson Investigators ("IAA") in 2018, which required two years of continuous on-the-job training that covered a myriad of topics, all of which are related to fire and explosion investigations.

4. My responsibilities include conducting complex post-fire and post-blast investigations, identifying the origins and causes of fires, identifying post-blast evidence, authoring origin and cause reports, conducting interviews, serving search and seizure warrants, analyzing and interpreting data obtained from legal process, making arrests, and testifying in legal proceedings. I have received extensive training related to arson and explosive investigations, which includes the ability to identify explosive, incendiary, and destructive devices.

5. During my employment with ATF, I have participated in several investigations involving individuals who committed arson and, in some cases, used explosives or incendiary devices. These investigations have included a variety of investigative techniques, including interviews, obtaining information from other law enforcement agencies, court-authorized searches of physical locations, as well as electronic devices and data retrieved from them, and the interception of wire and electronic communications, examining and preserving physical evidence, conducting surveillance, and reviewing financial, telephone, and other third-party records.

6. I have personally reviewed reports, documentation, and other evidence, observed scene photographs, and had conversations with employees at the ATF and other law enforcement agencies in regard to the investigation referred to below. I am familiar with the facts and circumstances of this investigation.

II. PURPOSE OF AFFIDAVIT

7. This affidavit is made in support of a criminal complaint against, and arrest warrant for, Jonathan Rinderknecht, also known as "Jonathan Rinder" and "Jon Rinder" ("RINDERKNECHT"), for a violation of 18 U.S.C. § 844(f)(1) (arson involving federal property and property owned by an organization receiving federal financial assistance).

8. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

III. SUMMARY OF PROBABLE CAUSE

9. A multi-agency investigation into the origin and cause of the massive Palisades Fire in Los Angeles, California, on

January 7, 2025, has determined that it was a "holdover" fire, i.e., a continuation of the Lachman Fire that began nearby early in the morning on January 1, 2025. Although the Los Angeles City Fire Department ("LAFD") quickly suppressed the Lachman Fire on January 1, unbeknownst to anyone the fire continued to smolder and burn underground, within the root structure of dense vegetation. On January 7, heavy winds caused the underground fire to surface and spread above ground in what became the Palisades Fire.¹ The Palisades Fire caused widespread damage in the Pacific Palisades area of Los Angeles.

10. The criminal investigation determined that the cause of the Lachman Fire and Palisades Fire was RINDERKNECHT. As explained below, there is probable cause to conclude that RINDERKNECHT maliciously set the Lachman Fire just after midnight on January 1, 2025. He started the fire on land owned by the Mountains Recreation and Conservation Authority ("MRCA"), an organization that received federal funding. A week later, the same fire (then known as the Palisades Fire) burned federal property.

IV. STATEMENT OF PROBABLE CAUSE

11. Based on my own participation in this investigation, my review of law enforcement reports and evidence from this

¹ For ease of reference, this affidavit refers to the Lachman Fire and Palisades Fire using the individual fire names that initially were assigned to them. However, as explained herein, the Palisades Fire was determined to be a holdover (i.e., continuation) of the Lachman Fire, meaning that they were essentially the same fire that burned and/or smoldered continuously.

investigation, and my discussions with law enforcement colleagues, I know the following:

A. The Lachman Fire

1. RINDERKNECHT's Proximity to the Lachman Fire

12. On the evening of December 31, 2024, RINDERKNECHT was working as a driver for Uber. Two passengers that he drove on separate trips between 10:15 p.m. and 11:15 pm. that night later told investigators that they remembered that RINDERKNECHT appeared agitated and angry.

13. At approximately 11:28 p.m., RINDERKNECHT used his iPhone to access YouTube to listen to the song entitled "Un Zder, Un The," by the French artist Josman. I have reviewed an English translation of the French lyrics for the song, and a theme of the song is despair and bitterness. (During his interview on January 24, 2025, RINDERKNECHT admitted he was fluent in French; he grew up in France.) Google records indicate that RINDERKNECHT had listened to the same song nine times in the previous four days. The music video for the song shows the main character (Josman) lighting things on fire. Google records indicate that RINDERKNECHT had watched the music video three times in the previous four days.

14. At approximately 11:34 p.m., RINDERKNECHT dropped off a passenger on Palisades Drive in the Pacific Palisades. As RINDERKNECHT later admitted in a recorded interview on January 24, 2025, and as video footage from the neighborhood confirmed, he then continued driving (alone) eastbound up Palisades Drive toward the Skull Rock Trailhead.

15. RINDERKNECHT was very familiar with the area. He previously had lived in a house roughly one block away from the trailhead. RINDERKNECHT told investigators that he had hiked along the Temescal Ridge Trail many times.

16. At approximately 11:38 p.m., RINDERKNECHT parked his car at the Skull Rock Trailhead, as video footage confirms. After parking, he attempted to contact a former friend (who had lived in the same nearby house where RINDERKNECHT had lived) via Facebook Messenger, but did not connect.

17. As RINDERKNECHT admitted in his recorded interview, he then walked up the trail, which comprised a series of concrete switchbacks and drainage ditches, to where the trail connected to the Temescal Ridge Trail. (A sign at the beginning of the trail stated "Danger" and "No Fires/Smoking.") RINDERKNECHT then walked up a narrow dirt path to a small clearing at the top of the hill. (The former friend of RINDERKNECHT who lived in the nearby house told investigators that he and RINDERKNECHT had spent a lot of time together at that small clearing.) The clearing is sometimes referred to as the "Hidden Buddha" because it had a short, hollowed out remnant/stump from a wooden utility pole where people sometimes placed small Buddha figurines.

18. The first image below shows the trail that RINDERKNECHT used to walk up to the Hidden Buddha clearing. The second image is a photograph taken from the Hidden Buddha clearing looking south, after the Lachman Fire but before the Palisades Fire (the Hidden Buddha feature is visible on the

left; vegetation burned by the Lachman Fire is visible beyond it).



19. At approximately 11:47 p.m., RINDERKNECHT used his iPhone to take two videos in or near the Hidden Buddha clearing. In the videos, RINDERKNECHT panned around almost 360 degrees, capturing the view from the top of the hill. No fire (or fireworks) were visible.

20. At approximately 11:54 p.m., RINDERKNECHT used his iPhone to again listen to the song entitled "Un Zder, Un The," by the French artist Josman.

21. A number of environmental sensing platforms, which included cameras, operated by the University of California at San Diego ("UCSD") captured data and video 24 hours a day of the hillsides in the region (in order to detect wildfires). The investigative team analyzed all of the relevant footage from those cameras. The first indication of the Lachman Fire was captured at 12:12:01 a.m. on January 1, 2025, from a camera approximately 4.7 miles away. Footage taken from that same camera 35 seconds earlier did not show a fire. A closer camera, approximately two-tenths of a mile away from the Hidden Buddha clearing, first captured the glow of the fire at 12:12:21 a.m.

22. RINDERKNECHT attempted to call 911 at approximately 12:12:31 a.m. The call did not go through, most likely because he was out of cellphone range. The GPS data obtained from RINDERKNECHT's iPhone carrier for that attempted call placed his iPhone slightly below the Hidden Buddha clearing.

23. Approximately 19 seconds later, at approximately 12:12:50 a.m., RINDERKNECHT attempted to call 911 again, again unsuccessfully. The GPS data for that attempted call was more precise, and placed him in the Hidden Buddha clearing.

24. The UCSD video footage indicated that the fire grew quickly. Footage from a camera approximately 6.5 miles away first captured the fire at 12:13:11 a.m. Approximately three seconds later, at approximately 12:13:14 a.m., RINDERKNECHT

again attempted (unsuccessfully) to call 911, again from the Hidden Buddha clearing. Two other cameras also captured footage of the growing fire at 12:13:20 a.m. and 12:13:37 a.m. At approximately 12:13:40 a.m., RINDERKNECHT again attempted (unsuccessfully) to call 911, again from the Hidden Buddha clearing. (The image below shows a still taken from footage from a UCSD camera, approximately two-tenths of a mile away, at 12:13:20 a.m. on January 1, 2025. The bright spot in the upper left is the Lachman Fire. RINDERKNECHT's parked car is visible down the hill to the right.)



25. RINDERKNECHT then left the Hidden Buddha clearing and headed down the hill toward his car, using the same trail that he had used to walk up the hill. GPS data obtained from RINDERKNECHT's iPhone carrier shows that he attempted to call 911 several more times while descending the hill.

26. At approximately 12:17 a.m., RINDERKNECHT called 911 again, and for the first time his call connected. GPS data for this call shows that he was almost at the bottom of the trail. On the call, RINDERKNECHT reported the fire (by that point a local resident already had reported the fire to 911). During the call, RINDERKNECHT typed a question into the ChatGPT app on his iPhone, asking, "Are you at fault if a fire is lift [sic] because of your cigarettes." (ChatGPT's response was "Yes," followed by an explanation.)

27. RINDERKNECHT then got into his car and drove away from the fire, at around approximately 12:20 a.m. His movements were captured by camera footage from nearby residences. On his way down Palisades Drive (westbound), he passed fire engines driving up Palisades Drive (eastbound), responding to the fire. RINDERKNECHT turned around and followed the fire engines to the scene. RINDERKNECHT was driving at what appeared to be a high rate of speed.

28. When RINDERKNECHT arrived back at the base of the hill, firefighters were beginning to respond to the Lachman Fire. RINDERKNECHT later told investigators that he offered to help the firefighters fight the fire. Based on my training and experience, that would be highly unusual conduct.

29. RINDERKNECHT then walked back up the same trail that he had used to climb up and down the hill earlier that night, in order to watch the fire and the firefighters. At approximately 1:02 a.m., RINDERKNECHT used his iPhone to take four short videos of the fire and firefighters, from the same trail.

30. That night the LAFD, assisted by the Los Angeles County Fire Department, used water drops from aircraft and hose lines, as well as handlines dug by Los Angeles County Fire Department crews, to attack the fire. Suppression efforts continued during the day of January 1, 2025, as firefighters continued to wet down areas within the fire perimeter. When the suppression efforts were over, the fire crews intentionally left fire hoses on site, in case they needed to be redeployed.

31. On January 2, 2025, LAFD personnel returned to the scene to collect the fire hoses. It appeared to them that the fire was fully extinguished.

2. The Origin and Cause of the Lachman Fire

32. After the Palisades Fire, federal, state, and local law enforcement agencies conducted a comprehensive investigation into the Lachman Fire and the Palisades Fire, under the leadership of the ATF's National Response Team.

33. Investigators determined that the ignition area for the Lachman Fire was an area located approximately 30 feet south of the Hidden Buddha feature. The overall area for the ignition area was approximately 20 feet by 20 feet. The area does not include any hiking trails, but was accessible via a small depression/gulley running downhill from the Hidden Buddha clearing.

34. Investigators obtained what is known as "Timing Advance" data from T-Mobile and AT+T to determine what

cellphones were in that area during the relevant timeframe.² Using this data, investigators were able to determine that no cell phones using those providers were in the vicinity of the Hidden Buddha clearing during the relevant time period (other than RINDERKNECHT's iPhone). That finding corroborated (1) RINDERKNECHT's statement to investigators at his January 24 interview that he did not see anyone else when he was at the top of the hill that night; and (2) video footage that showed only one person (presumably RINDERKNECHT) using the trail prior to the fire.

35. The investigative team excluded other potential causes of the Lachman Fire. For example:

a. Fireworks were excluded because, in pertinent part, (1) nobody (including RINDERKNECHT) saw fireworks in the vicinity of the Pacific Palisades prior to the start of the Lachman Fire;³ (2) none of the voluminous UCSD video footage captured evidence of fireworks in the area prior to the start of the Lachman Fire; and (3) no evidence of fireworks was found in the origin area.

b. Lightning was excluded because lightning strike data indicated that there were no strokes detected on December

² No relevant data was available from Verizon, because Verizon's data from December 31 and January 1 was no longer available when this investigation began.

³ I am aware of media reports suggesting that fireworks were the cause of the Lachman Fire. Based on my training and experience and this investigation, I believe that those reports were incorrect and the result of people hearing (but not seeing) fireworks in adjacent areas that night.

31, 2024 and January 1, 2025 within a 100-kilometer radius of the Pacific Palisades.

c. Power lines were excluded following an analysis of data from the Los Angeles Department of Water and Power ("LADWP"). The investigation showed that no electrical utility infrastructure was located within the identified general and specific origin areas of the Lachman Fire, and there were no failures associated with the electrical utility infrastructure in the area in the relevant time frame.

d. Refraction of sunlight via glass was examined due to the presence of a glass bottle and broken glass in the general origin area. Refraction was excluded because the fire began at night, and weather data showed that the weather during the day of December 31, 2024, was a combination of mist, haze, and mostly cloudy weather that was not conducive to a refraction fire.

e. Smoking was also examined as a possible ignition source, due to RINDERKNECHT's statements that he sometimes smoked cigarettes and his presence in the Hidden Buddha clearing (approximately 30-40 feet from the specific origin area) at the time the fire was discovered.⁴ Smoking was excluded as a cause. Although discarded cigarettes can cause wildfires, the weather conditions (including temperature, humidity, wind, and fuel moisture content) on December 31, 2024 to January 1, 2025, were inconsistent with this theory, among other reasons.

⁴ During his interview on January 24, 2025, RINDERKNECHT gave conflicting statements about whether he smoked cigarettes on the hillside that night.

36. Upon having conducted a systematic examination of the fire scene, which resulted in the development, testing, and elimination of multiple hypotheses, and having excluded these and other potential causes, the investigative team determined that the cause of the Lachman Fire was incendiary, i.e., an intentional ignition of a fire in an area or under circumstances where or when there should not be a fire. The cause of the fire was determined to be the introduction of an open flame (likely a lighter) to a combustible material such as vegetation or paper. This determination was based on a number of factors, including:

a. As noted above, GPS data obtained from RINDERKNECHT's iPhone carrier for his 911 calls placed his iPhone within approximately 30-40 feet of the specific origin area at the time the fire was discovered. There is no evidence that anyone else was in that area at that time; as noted above, RINDERKNECHT told investigators that he did not see anyone else from the top of the hill that night, as was corroborated by the available Timing Advance cellphone data.

b. As noted above, the UCSD video footage indicated that the fire grew quickly. The first indication of a fire was captured at 12:12:01 a.m. on January 1, 2025 (from a camera approximately 4.7 miles away). The same camera platform captured a much larger glow from the fire a minute later, at approximately 12:13:37 a.m. A different camera, approximately two-tenths of a mile away from the Hidden Buddha, captured a large glow from the fire at 12:13:20 a.m. (As noted above, GPS data showed that RINDERKNECHT was still in the Hidden Buddha

clearing at this time.) The investigative team concluded that the rapid growth of the fire was consistent with a sudden conflagration and was inconsistent with a slow, developing, smoldering fire (such as can be caused by a discarded cigarette).

c. During his interview on January 24, 2025, RINDERKNECHT told investigators (correctly) that the Lachman Fire began on the hillside below and south of the Hidden Buddha clearing. The investigators are not aware of any other way for RINDERKNECHT to have known this non-public information other than having witnessed the start of the fire.

d. During his January 24 interview, RINDERKNECHT's statements about his location upon discovering the Lachman Fire were inconsistent with the geolocation data obtained from his iPhone carrier for his 911 calls. RINDERKNECHT repeatedly told investigators that he first saw the fire (and first called 911) after he left the Hidden Buddha clearing and walked down much of the trail toward his car. As noted above, the GPS data obtained from RINDERKNECHT's iPhone carrier showed that he was standing in the Hidden Buddha clearing when he first called 911. The GPS data also showed that, after RINDERKNECHT's first attempt to call 911 at approximately 12:12:31 a.m., he remained in the Hidden Buddha clearing until at least 12:13:40 a.m., when he made his fourth attempt to call 911. This indicates that RINDERKNECHT watched the fire grow for over a minute while he remained in the Hidden Buddha clearing.

37. Additional evidence (in addition to what is described above) supports the conclusion that RINDERKNECHT maliciously started the Lachman Fire. For example:

a. During his interview on January 24, 2025, investigators noticed that RINDERKNECHT's carotid artery would pulsate and become visible whenever they asked RINDERKNECHT a question about how the fire started or who started it. Based on my training and experience, that indicates that RINDERKNECHT was extremely anxious as to that issue.

b. As noted above, RINDERKNECHT watched the fire grow for over a minute while he remained in the Hidden Buddha clearing. Based on my training and experience, RINDERKNECHT's decision to watch the fire grow for over a minute from the Hidden Buddha clearing, coupled with his subsequent statements to investigators that he was not in the Hidden Buddha clearing when he first saw the fire, is consistent with arson.

c. While RINDERKNECHT was descending the hill after the Lachman Fire had begun on January 1, 2025, he made a three-minute screen-recording on his iPhone, recording himself attempting to call 911 several times (and eventually connecting with 911), and asking ChatGPT, "Are you at fault if a fire is lift [sic] because of your cigarettes?" Based on my training and experience and this investigation, this indicates that RINDERKNECHT wanted to preserve evidence of himself trying to assist in the suppression of the fire and he wanted to create evidence regarding a more innocent explanation for the cause of the fire.

d. As noted above, after calling 911 and leaving the hillside on January 1, 2025, and then seeing firefighters driving up Palisades Drive to respond to the fire, RINDERKNECHT turned around, followed the firefighters up to the fire, and filmed them responding to it. Based on my training and experience, arsonists sometimes call 911 to report the fires they have set, and arsonists sometimes like to watch firefighters respond to the fires that they have set.

e. A witness who encountered RINDERKNECHT near the fire at around 1:00 a.m. on January 1, 2025, told investigators that RINDERKNECHT (whom he did not know) told him that RINDERKNECHT had been down the hill at a house party when RINDERKNECHT first saw the fire. Based on this investigation, that was a false statement.

f. Video footage from RINDERKNECHT's iPhone time-stamped on the afternoon of December 31, 2024, showed what appears to be a green, barbecue-style lighter inside RINDERKNECHT's apartment. Investigators found what appears to be the same lighter in the glove compartment of RINDERKNECHT's car when they searched it on January 24, 2025. (Subsequent laboratory testing confirmed that a sample of DNA found on the lighter from RINDERKNECHT's glove compartment matched a sample of RINDERKNECHT's DNA.) Video footage from RINDERKNECHT's iPhone on January 1, 2025, at approximately 1:44 a.m., showed that RINDERKNECHT's glove compartment was open while he was driving. During his January 24 interview, RINDERKNECHT admitted that he brought a lighter with him when he walked up to the

Hidden Buddha clearing, but he claimed that he could not remember what kind of lighter he brought.

g. As noted above, two Uber passengers whom RINDERKNECHT provided rides to shortly before midnight on December 31, 2024, remembered weeks later that RINDERKNECHT appeared agitated and angry that night.

h. On November 1, 2024, RINDERKNECHT asked the following prompt to ChatGPT: "I am 28 years old. And... I basically... This just happened. Maybe like... I don't know, maybe like 3 months ago or something. Like, the realization of all this. I literally burnt the Bible that I had. It felt amazing. I felt so liberated." On August 30, 2024, RINDERKNECHT wrote to a family member, "Burned the Bible I had literally."

i. On July 11, 2024, RINDERKNECHT provided the following prompt to ChatGPT: "A dystopian painting divided into distinct parts that blend together seamlessly. On the far left, there is a burning forest. Next to it, a crowd of people is running away from the fire, leading to the middle. In the middle, hundreds of thousands of people in poverty are trying to get past a gigantic gate with a big dollar sign on it. On the other side of the gate and the entire wall is a conglomerate of the richest people. They are chilling, watching the world burn down, and watching the people struggle. They are laughing, enjoying themselves, and dancing. The scene is detailed and impactful, highlighting the stark contrast and the direct

connection between the different parts of the world.” In response, ChatGPT produced the following image:



3. The Destruction Caused by the Lachman Fire

38. The Lachman Fire burned approximately 8 to 10 acres before being suppressed by the LAFD. The fire started on property owned by the Mountains Recreation and Conservation Authority (“MRCA”) and spread onto land owned by California State Parks (Topanga State Park).

39. The MCRA is an organization that receives federal financial assistance. For example, over the past decade the MRCA has received hundreds of thousands of dollars in federal funding and equipment from the National Park Service, the United States Forest Service, the Federal Emergency Management Agency, and the California Fire Assistance Agreement.

40. California State Parks, and Topanga State Park in particular, also receive federal financial assistance. For example, information provided by California State Parks shows that Topanga State Park has received tens of thousands of dollars in the last few years from the Federal Emergency Management Agency.

B. The Palisades Fire

41. The Palisades Fire was first reported by a witness who lived in the area. The witness called 911 and took a photograph of the fire from his backyard, at approximately 10:27 a.m. on January 7.

1. The Origin and Cause of the Palisades Fire

42. After extensive analysis, the investigative team determined that the specific origin area of the Palisades Fire was a burned-out root structure at the base of dense vegetation approximately 20 feet south of the perimeter of the Lachman Fire. The perimeter was the handline dug by Los Angeles County Fire Department crews on January 1 along the south containment line of the Lachman Fire. (The first image below is a photograph taken by a drone after the Lachman Fire but before the Palisades Fire, looking north. The second image shows the perimeter of the Lachman Fire (in red) and the specific origin areas of the Lachman Fire and the Palisades Fire.)



43. The investigative team determined that the Palisades Fire was a holdover fire, defined as a fire that remains dormant for a considerable time. Investigators determined that during the Lachman Fire a firebrand became seated within the dense vegetation and continued to smolder and burn within the root structure of the vegetation. This underground burning was not visible to firefighters in the aftermath of the Lachman Fire and was not visible to members of the public who visited the hillside after the Lachman Fire. The strong sustained winds and even stronger wind gusts in the area on the morning of January 7, 2025, created conditions in which the holdover fire from the Lachman Fire ignited additional fuels and spread, becoming the Palisades Fire.

44. In determining that the Palisades Fire was a holdover fire, the investigative team ruled out other potential causes of the Palisades Fire. For example:

a. Potential causes such as campfires and smoking were excluded because the initial fire appeared to have been burning in the root system of dense vegetation. Moreover, there was no evidence to support human involvement on January 7, other than RINDERKNECHT's actions on January 1, in the start of the Palisades Fire.

b. Power lines were excluded as a potential cause following an analysis of data from LADWP. The investigation showed that no electrical utility infrastructure was located within the identified general and specific origin areas of the Palisades Fire, and there were no failures associated with the

electrical utility infrastructure in the area in the relevant time frame.

c. Lightning was excluded because lightning strike data indicated that there were no strokes detected between December 31, 2024 and January 8, 2025, within a 100-kilometer radius of the Pacific Palisades.

d. Refraction was excluded because no glass was identified in the specific origin area after an extensive search.

2. Federal Interests Affected by the Palisades Fire

45. The Palisades Fire burned federal land and destroyed federal property. For example, the fire burned approximately 202 acres of federal land, known as the Camp 8 Historic District, within the Santa Monica Mountains National Recreation Area. Several buildings within the Camp 8 Historic District burned in the fire.

46. The Palisades Fire also burned buildings and other real property of organizations that received federal financial assistance. For example, the fire burned thousands of acres of property owned by the MRCA and Topanga State Park. As noted above, the MRCA and Topanga State Park both receive federal financial assistance.

47. Full containment of the Palisades Fire was achieved on January 31, 2025.

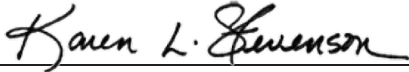
V. CONCLUSION

48. For all the reasons described above, there is probable cause to believe that RINDERKNECHT has committed a violation of

18 U.S.C. § 844(f)(1) (arson involving federal property and property owned by an organization receiving federal financial assistance).

William M. Schry, Special
Agent/Certified Fire
Investigator
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 2nd day of
October, 2025.



HONORABLE KAREN L. STEVENSON
CHIEF UNITED STATES MAGISTRATE
JUDGE