

BILL ESSAYLI MOVES TO DISMISS KEY “ASSAULT” CASE BEFORE DOJ HAS TO EXPLAIN WHAT IT KNEW

The high profile politicized prosecutions – of Jim Comey, Tish James, and John Bolton (and of LaMonica McIver if the press weren’t broken) – are really important tests of Trump’s attempt to turn DOJ into a weapon.

But the relatively anonymous cases – as often as not, defended by Federal Public Defenders – are just important a vindication of rule of law.

Today’s important victory goes to Ashleigh Brown. She was charged in conjunction with a confrontation with Federal Protective Services (not, NOT ICE or CBP) outside Roybal Federal Building in Los Angeles on August 2.

c. Approximately three [Federal Protective Services] Officers, including FPS Officer Z.C., walked out to remove REDONDO-ROSALES from the path of the government car. As the group of FPS officers approached REDONDO-ROSALES, he moved backwards away from the FPS officers in an apparent attempt to avoid being apprehended. Then, FPS Officer Z.C. approached REDONDO-ROSALES in an effort to detain him, and REDONDO-ROSALES intentionally struck Officer Z.C. in the face with his left hand (at the time, REDONDO-ROSALES had a tan, wide-brimmed hat in his left hand).

d. After FPS officers were able to detain REDONDORO-SALES, Officer Z.C. and approximately four other FPS officers began to escort REDONDO-ROSALES towards the Alameda Street Entrance.

e. As Officer Z.C. walked a few feet in front of the two FPS officers who were escorting REDONDO-ROSALES toward the Alameda Street Entrance, BROWN approached Officer Z.C. and stepped into Officer Z.C.'s path. Officer Z.C. continued past BROWN toward the Alameda Street Entrance, but as he did so, BROWN intentionally hit Officer Z.C. in his left side with her right arm.

The felony charge against Brown was reportedly no-billed by a jury. For whatever reason, Bill Essayli charged her with misdemeanor interference instead, only to succeed in getting her detained after she allegedly violated bail by following an ICE officer home, for which she and two others were charged with conspiracy to dox him.

Though in Brown's response to a 404(b) notice attempting to present the doxing case to the "assault" jury, her lawyers claimed that, "R.H. got into his personal vehicle and drove to where Ms. Brown was parked. He stopped his vehicle in the driveway, blocking Ms. Brown's vehicle from leaving." That is, even on the case that did get indicted, the cop in question arguably instigated the confrontation.

There were a number of things that would have been interesting if this had gone to trial, including Brown's sealed filings about why she had a claim of self defense, as well as her success, after submitting them, in getting an order to share DHS' Use of Force guidelines.

But things got interesting today when Brown submitted a motion to disqualify the victim in this case, ZC, from testifying based on DOJ's failure to tell the defense that he had a (misdemeanor) criminal record, most notably a conviction in a harassment involving physical contact charge just four years ago.

C. Defense Discovers Z.C.'s Criminal History

On October 23, 2025, while preparing for trial in this matter, defense counsel learned that Z.C. has criminal history that includes at least:

- *Harassment – subjecting a person to physical contact, in violation of Pennsylvania Statute § 18.2709(a)(1), convicted on June 17, 2021;*
- *Disorderly conduct, in violation of Florida Statute § 509.143, arrested on August 31, 2014; and*
- *Driving under the influence, in violation of Florida Statute § 316193(1), convicted on November 4, 2013.*

Exhibits H, I, filed under seal.

These records were obtained through independent defense investigation. Of note, the defense does not have access to law enforcement databases and thus cannot confirm whether this is Z.C.'s complete criminal history or whether there is additional relevant information about these or any other arrests or convictions.

D. Defense Contacts

the USAO With Its Findings. The USAO States It Was Not Aware of Z.C.'s Assault History.

On October 26, 2025, after further research and internal discussion, defense counsel contacted government counsel regarding its findings. Government counsel requested a few hours to investigate and respond. Later that evening, the parties conferred by telephone. Government counsel indicated that it was not previously aware of Z.C.'s 2021 conviction for assault. The government had asked Z.C. about his prior convictions in interviews. The government was only aware of Z.C.'s 2014 arrest for disorderly conduct and his 2013 conviction for driving under the influence. In addition, government counsel stated that it had not conducted an independent Henthorn review of Z.C., but had relied on the word and responsiveness of another agency (FPS) to conduct a Henthorn review of Z.C.'s personnel file.

The judge in the case, Obama appointee Fernando Olguin, was not only interested in learning more about DOJ's failure to disclose this detail, but also who, if anyone, knew about ZC's criminal history, and if so, why they didn't disclose it.

Having reviewed and considered all the briefing filed with respect to defendant's Motion to Compel Production of Complete Personnel Files and Motion in Limine to Exclude Testimony of Z.C., (Dkt. 83, "Motion"), the court concludes that it would benefit from full briefing on the issues presented in the Motion. Accordingly, IT IS ORDERED THAT:

1. The government shall file its papers

in opposition to the Motion by no later than Tuesday, October 28, 2025 at 5:00 p.m.

2. Together with its opposition, the government must submit a declaration signed by counsel for the government that sets forth the names and titles of the individuals who conducted the Henthorn and/or Brady reviews of the relevant personnel file materials, and the dates on which such reviews were conducted. Counsel for the government is cautioned that failure to provide such a declaration may lead to the imposition of sanctions, including but not limited to the exclusion of evidence and/or witnesses.

Normally, when DOJ has decided they have to abandon false assault charges, they attempt to dismiss without prejudice.

Not so here. They're filing to dismiss *with* prejudice.

The United States moves to dismiss its information with prejudice against defendant in the interests of justice under Federal Criminal Rule 48(a), and therefore respectfully requests that the Court grant its motion. Defendant does not oppose dismissal and the parties agree all pending motions should be denied as moot.

Brown's legal troubles are not done. The doxing case is a felony, and as a conspiracy case, DOJ has broader leeway for introducing evidence against Brown. She remains detained (based on her prior violation of bail) in that case.

But DOJ has been attempting to link these two cases, presumably as a way to salvage the initial assault case.

And even that tactic could now backfire.

US v Brown (assault) docket

US v. Raygoza (conspiracy to dox) docket