

1 BILAL A. ESSAYLI
First Assistant United States Attorney
2 ALEXANDER B. SCHWAB
Assistant United States Attorney
3 Acting Chief, Criminal Division
MARK A. WILLIAMS (Cal. Bar No. 239351)
4 Chief, Environmental Crimes & Consumer Protection Section
MATTHEW W. O'BRIEN (Cal. Bar No. 261568)
5 LAURA A. ALEXANDER (Cal. Bar No. 313212)
DANBEE C. KIM (Cal. Bar No. 350014)
6 Assistant United States Attorneys
Environmental Crimes & Consumer Protection and
7 Public Corruption & Civil Rights Sections
1100/1400 United States Courthouse
8 312 North Spring Street
Los Angeles, California 90012
9 Telephone: (213) 894-3359/8644/0141/6530
Facsimile: (213) 894-1019
10 Email: mark.williams@usdoj.gov
matthew.obrien@usdoj.gov
11 laura.alexander@usdoj.gov
danbee.kim2@usdoj.gov
12

Attorneys for Plaintiff
13 UNITED STATES OF AMERICA

14 UNITED STATES DISTRICT COURT

15 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 JONATHAN RINDERKNECHT,

20 Defendant.
21

No. CR 25-833-AH

GOVERNMENT'S OPPOSITION TO
DEFENDANT'S APPLICATION FOR REVIEW
OR RECONSIDERATION OF DEFENDANT'S
DETENTION ORDER; DECLARATION OF
LAURA A. ALEXANDER; EXHIBITS

22 Plaintiff United States of America, by and through its counsel
23 of record, the First Assistant United States Attorney for the Central
24 District of California and Assistant United States Attorneys Mark A.
25 Williams, Matthew W. O'Brien, Laura A. Alexander, and Danbee C. Kim,
26 hereby submits its Opposition to Defendant Jonathan Rinderknecht's
27 Application for Review or Reconsideration of His Detention Order
28 (Dkt. 24.)

1 This Opposition is based upon the attached memorandum of points
2 and authorities, the Declaration of Laura A. Alexander and the
3 exhibits attached thereto, the files and records in this case, and
4 such further evidence and argument as the Court may permit.

5 Dated: November 17, 2025

Respectfully submitted,

6 BILAL A. ESSAYLI
7 First Assistant United States
8 Attorney

9 ALEXANDER B. SCHWAB
10 Assistant United States Attorney
11 Acting Chief, Criminal Division

12 /s/

13 MARK A. WILLIAMS
14 MATTHEW W. O'BRIEN
15 LAURA A. ALEXANDER
16 DANBEE C. KIM
17 Assistant United States Attorneys

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
20
21
22
23
24
25
26
27
28

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Defendant Jonathan Rinderknecht, also known as "Jonathan Rinder"
4 and "Jon Rinder" ("defendant"), maliciously started a fire on January
5 1, 2025, in the Pacific Palisades. The fire developed into what
6 became known as the Palisades Fire, one of the most destructive
7 wildfires in Los Angeles history.

8 On October 7, 2025, defendant was arrested on a criminal
9 complaint charging him with destruction of property by means of fire,
10 in violation of 18 U.S.C. § 844(f)(1) (C.D. Cal. Case No. 2:25-MJ-
11 6103). He made his initial appearance the next day in the Middle
12 District of Florida (M.D. Fla. Case No. 6:25-MJ-2115). The following
13 day, the Honorable Nathan Hill, United States Magistrate Judge, held
14 a detention hearing, and heard live testimony from a Special Agent of
15 the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF")
16 regarding defendant's significant flight risk and danger to the
17 community. After hearing this agent's testimony, and argument from
18 the parties, the Court ordered defendant detained pending trial. See
19 18 U.S.C. § 3142(e).

20 One week later, a federal grand jury indicted defendant on three
21 felony counts: (1) destruction of property by means of fire, in
22 violation of 18 U.S.C. § 844(f)(1); (2) arson affecting property used
23 in interstate commerce, in violation of 18 U.S.C. § 844(i); and
24 (3) timber set afire, in violation of 18 U.S.C. § 1855. Together,
25 these charges expose defendant to a mandatory minimum term of five
26 years' imprisonment, and a statutory maximum term of 45 years'
27 imprisonment. On October 23, 2025, defendant made his first
28 appearance in this district on these charges. (Dkt. 21.)

1 Defendant now seeks reconsideration of Judge Hill's carefully
2 considered detention order. However, as discussed in more detail
3 below, no sureties or other conditions of release would serve to
4 reasonably assure defendant's appearance at future proceedings and
5 the safety of the community while defendant awaits trial.

6 First, defendant poses a substantial flight risk. He has
7 significant ties to France, where he was raised and where his parents
8 live; he has ties to Indonesia, where he expressed a desire to move
9 and work as recently as September 2025; he has limited ties to Los
10 Angeles; and he has unstable employment and housing. Defendant also
11 has every incentive to flee, as he is facing a statutory maximum term
12 of 45 years' imprisonment.

13 Second, defendant presents an enormous danger to the community.
14 As summarized in the criminal complaint, defendant is alleged to have
15 maliciously started the Palisades Fire, and evidence gathered
16 throughout the course of this investigation highlights defendant's
17 feelings of despair and violent tendencies. Last spring, defendant's
18 sister invited defendant, given his financial difficulties, to live
19 with her and her family in Florida. After five months of defendant's
20 erratic behavior -- including (1) defendant threatening to burn his
21 sister's house down, (2) defendant purchasing a firearm and
22 threatening to use it to kill his brother-in-law, and (3) two 911
23 calls placed by defendant's family due to defendant's erratic
24 behavior -- defendant's sister and her family moved out of their own
25 home for fear of their own safety, while defendant refused to move
26 out. And defendant lied about these facts when he was interviewed
27 by Probation and Pretrial Services ("Probation") in the Middle
28 District of Florida. Defendant represented to Probation (and the

1 Court) that he was currently living with his sister and her family;
2 in fact, he was living alone in his sister's home, because she and
3 her family had moved out solely due to their fear of defendant.

4 Given that defendant's own family members could not live with
5 him for fear of the danger that he presented, no family member
6 sureties or other bond conditions can reasonably assure the
7 defendant's appearance at future proceedings or the safety of the
8 community. Further, defendant cannot be trusted to work with
9 Probation and comply with any bond conditions set by this Court
10 because he has repeatedly demonstrated he cannot be truthful. Judge
11 Hill's detention order was correct and should not be revisited.

12 **II. PROCEDURAL HISTORY**

13 As explained above, defendant was ordered detained after his
14 detention hearing in the Middle District of Florida on October 9,
15 2025. At defendant's arraignment in this district on October 23,
16 2025, the defense challenged his detention but offered no new
17 information, such as a proposed surety, in support of his release.

18 After learning of defendant's request for the upcoming hearing
19 on November 18, the government inquired with defense counsel several
20 times regarding the new information purportedly justifying
21 defendant's application for reconsideration of his detention order.
22 Defense counsel informed the government that defendants' parents may
23 be willing to serve as sureties (no additional details were
24 provided), that there were purported factual inaccuracies at the
25 prior detention hearing in Florida, and that defense counsel had
26 identified a new proposed housing situation for defendant (no
27 additional details were provided). The government expressly reserves
28 its right to supplement this brief should defense counsel disclose

1 any new information after the time of this filing and prior to or
2 during the November 18th hearing.

3 **III. ARGUMENT**

4 **A. Legal Standard**

5 Pretrial detention of a defendant without bail is appropriate
6 where "no condition or combination of conditions will reasonably
7 assure the appearance of the person as required and the safety of any
8 other person and the community." 18 U.S.C. § 3142(e). Detention is
9 appropriate where a defendant is either a danger to the community or
10 a flight risk; it is not necessary to prove both. 18 U.S.C.
11 § 3142(e); United States v. Motamedi, 767 F.2d 1403, 1406 (9th Cir.
12 1985). "[T]he government bears the burden of showing by a
13 preponderance of the evidence that the defendant poses a flight risk,
14 and by clear and convincing evidence that the defendant poses a
15 danger to the community." United States v. Gebro, 948 F.2d 1118,
16 1121 (9th Cir. 1991) (citing Motamedi, 767 F.2d at 1406-07).
17 Moreover, "[t]here are no formal evidentiary rules; the rules
18 concerning admissibility of evidence in criminal trials are
19 inapplicable. . . . [and] [t]he Court may proceed based on proffer
20 and hearsay." United States v. Possino, No. CR 13-00048-SVW, 2013 WL
21 1415108, at *2 (C.D. Cal. Apr. 8, 2013) (citing United States v.
22 Winsor, 785 F.2d 755, 756 (9th Cir. 1986)).

23 The court considers four factors in determining whether the
24 pretrial detention standard is met: (1) the nature and seriousness of
25 the offense charged; (2) the weight of the evidence against the
26 defendant; (3) the defendant's history and characteristics, including
27 family and community ties and past criminal conduct; and (4) the
28 nature and seriousness of the danger to any person or the community

1 that would be posed by the defendant's release. See 18 U.S.C.
2 § 3142(g).

3 **B. Defendant Presents a Substantial Flight Risk**

4 Judge Hill correctly determined that there is a substantial risk
5 of defendant's nonappearance at future proceedings, and no condition
6 or combination of conditions of pretrial release would mitigate this
7 risk. See 18 U.S.C. § 3142(e). Facing a mandatory minimum term of
8 five years' imprisonment and a statutory maximum term of 45 years'
9 imprisonment if convicted, defendant has every reason to flee. See
10 Declaration of Laura A. Alexander ("Alexander Decl.", ¶ 2, Ex. A at
11 53) (Judge Hill: "[T]he higher the consequence, the higher the
12 incentive to flee.").

13 1. Defendant's Substantial International Ties

14 Defendant has significant ties abroad. Most notably, he is a
15 dual citizen of the United States and France, where he grew up and
16 lived for approximately 18 years. (Alexander Decl., ¶ 2, Ex. A at 8,
17 35.) Defendant's parents (whom defendant apparently is going to
18 propose as his sureties) and one of his siblings live permanently in
19 France. (Id.) Defendant is also fluent in French, and according to
20 defendant (who has lied to Probation and law enforcement officers in
21 this investigation, as detailed below), he once possessed a French
22 passport but "lost it," which Judge Hill found particularly
23 concerning, as defendant's assertion that he lost his passport could
24 not be verified by Probation. (Id. at 53.)

25 Defendant also has ties to Southeast Asia. For example, less
26 than two weeks before defendant's arrest, defendant sent a text
27 message to a friend stating that although he was currently residing
28 in Florida, he did not intend to stay long, and he was considering

1 moving to "[B]ali or [M]alaysia." (Alexander Decl., ¶ 3, Ex. B at
2 6.) Defendant also wrote, "I have job and place and friends waiting
3 in [B]ali." (Id.) Defendant confirmed this potential plan during
4 his post-arrest interview with ATF agents. (Alexander Decl., ¶ 4,
5 Ex. C at 2.)

6 2. Defendant's Lack of Ties to the Central District of
7 California

8 According to defendant, he was born in Indiana and moved with
9 his family to France when he was two years old. (Alexander Decl.,
10 ¶ 5, Ex. D at 4.) When he was 20 years old, he left France and moved
11 to Michigan. (Id.) About two years later, defendant moved to the
12 Los Angeles area, where he remained until the spring of 2025. (Id.)
13 After he was interviewed by law enforcement regarding his involvement
14 in the Palisades Fire, defendant moved to Florida to live with his
15 sister and her family. (Id.)

16 While living in Los Angeles, defendant rented a room in the
17 Pacific Palisades (a few blocks from where he started the fire on
18 January 1, 2025), and later rented an apartment in North Hollywood.
19 During this time, defendant was self-employed as a driver for Uber
20 and similar ride-share and grocery-delivery-service companies. (Id.
21 at 5.)

22 As far as the government is aware, defendant has no family,
23 friends, or place to live in the Central District of California.¹
24 Per defendant's October 23, 2025 interview with Probation in this
25 District, he stated that he "plan[ned] to live with a friend in the
26

27 ¹ As noted above, defense counsel has not disclosed to the
28 government defendant's proposed solution regarding defendant's lack
of a residence.

1 Central District of California" or his family members in Florida, but
2 could not recall the names or contact information for any of his Los
3 Angeles contacts. (Id. at 1.) Further, based on agents' review of
4 defendant's financial data, defendant was living paycheck to paycheck
5 (at best) when he lived in Los Angeles. (Alexander Decl., ¶ 2, Ex. A
6 at 37.) In an interview with law enforcement, defendant's sister
7 explained that just days after he moved into her home, he was "upset"
8 and "really angry" because he was "literally broke." (Alexander
9 Decl., ¶ 6, Ex. E at 2.)

10 Given the seriousness of the criminal charges in this case and
11 the financial difficulties that led defendant to move to Florida to
12 stay with his sister, it is difficult to envision defendant
13 maintaining stable employment and affording living expenses in this
14 community were the Court to release him on bond.

15 3. Defendant's Poor Ties to the Middle District of
16 Florida

17 In the spring of 2025, after the Palisades Fire, defendant moved
18 in with his sister, his brother-in-law, and their two young children
19 at his sister's home in Melbourne, Florida. The experience was a
20 disaster, and underscores exactly why this Court should order that
21 defendant remain detained pending trial.

22 According to his sister, defendant began behaving erratically
23 within days of moving into her home. (Alexander Decl., ¶ 6, Ex. E at
24 2.) She described defendant as "sensitive and volatile," and noted
25 that defendant threatened to burn her home down after only a few days
26 of living with her and her family. (Id.) Of the many altercations
27 between defendant and his family, two are particularly relevant here.
28

1 First, on September 19, 2025, defendant engaged in a
2 contentious verbal dispute with his sister in front of her young
3 children. Defendant and his sister, who recently had been diagnosed
4 with a serious illness, were arguing about whether defendant's sister
5 should become vegan. According to defendant's sister, defendant "was
6 screaming at her in front of her children and other children present
7 in the residence," and at one point, defendant told her five-year-old
8 child that his sister (their mom) "is going to die." (Alexander
9 Decl., ¶ 6, Ex. E at 3.) Defendant's sister and brother described
10 feeling "trapped in their own home," like they were "walking on
11 eggshells," and believed defendant was "off his meds." (Alexander
12 Decl., ¶ 7, Ex. F at 1.)

13 Second, on September 25, 2025, during another altercation
14 between defendant, his sister, and his brother-in-law, defendant said
15 that he would kill his brother-in-law "in self-defense." (Alexander
16 Decl., ¶ 6, Ex. E at 3.) Defendant's brother-in-law then called 911.
17 (Id.) When police arrived, officers confirmed that defendant had
18 recently purchased and possessed a Smith and Wesson .380 caliber
19 pistol. According to defendant's sister, defendant would not give up
20 the gun, which she requested, because "he may have to use it." (Id.)
21 Defendant's sister and brother-in-law asked the police how they could
22 start the eviction process to have defendant removed from their home
23 since he refused to leave. Just a week before defendant's arrest in
24 this case, defendant's sister and her family had to move out of their
25 own home for fear of their own safety, and defendant shamelessly
26 remained in his sister's home. In fact, defendant's sister offered
27 to pay him \$15,000 to move out; he refused to move out for less than
28 \$25,000. (Id. at 2-3.)

Following defendant's arrest, agents visited his sister's house to assist her in finding defendant's gun. Although defendant had told law enforcement that the gun was located in a "safe" space, and Probation (and the Court) that it was in a lockbox; neither of these statements was true. Instead, agents found the gun hidden inside of a stuffed animal in the home's garage, just feet above the ground, where defendant's sister's children could easily access it.



In sum, the evidence shows that even when defendant's family has attempted to assist defendant, their support was unsuccessful in mitigating defendant's mental health issues and violent tendencies, and placed his family members in grave danger. Judge Hill expressed particular concern at defendant's original detention hearing that it would be unwise, given defendant's erratic behavior, to permit defendant to live alone in his sister's home, especially in light of his "declining relations with [his] family." (Alexander Decl., ¶ 2, Ex. A at 54.) And as Judge Hill recognized, defendant would have to "drive all the way to California or find [his] way there for every one of the proceedings in this case." (Id.) This is simply

1 unrealistic given defendant's unstable employment, limited resources,
2 and incentive to flee.

3 4. Defendant's Declining Mental State and Use of
4 Prescription and Illegal Drugs

5 In explaining his rationale for defendant's pretrial detention,
6 Judge Hill cited defendant's mental decline. (See Alexander Decl.,
7 ¶ 2, Ex. A at 53-54.) Indeed, digital data reviewed as part of this
8 investigation revealed that defendant often experiences loneliness
9 and despair, and lacks any network of friends for support.
10 Interviews with defendant's family members -- including his sister
11 and his father (the proposed sureties) -- confirmed that defendant is
12 "sensitive," "volatile," and has experienced behavioral issues since
13 his childhood. (See id., ¶ 6, Ex. E at 2; ¶ 13.) Further, defendant
14 has a history of using marijuana, psilocybin (hallucinogenic
15 mushrooms), and other drugs. (See, e.g., id., ¶ 10, Ex. I at 1-2; ¶
16 11, Ex. J at 13; ¶ 4, Ex. C at 4.)

17 For example, on August 2, 2025, defendant was stopped by local
18 law enforcement in Florida for driving 71 miles per hour in a 45 mph
19 zone. (Id., ¶ 10, Ex. I at 1.) The officer commented, on his body-
20 worn camera, that defendant had a lot of "prescription bottles with
21 no labels on them," which the officer advised was unlawful. (Id. at
22 2.) Defendant told the officer what type of prescription drugs these
23 bottles contained. (Id.) The officer asked defendant to step out of
24 his vehicle because he wanted "to check those pills because the way
25 [defendant] was acting" concerned the officer that defendant was "on
26 something possibly." (Id.) Further, in an interview with law
27 enforcement, defendant's sister expressed concern that defendant was
28 acting erratically because he was "off his meds." (Alexander Decl.,

¶ 7, Ex. F at 1.) Defendant's history of illegal drug use and what appears to be poor management of other prescription medications shows that he cannot be trusted by this Court to abide by any conditions of release.

C. Defendant Is a Danger to the Community

Defendant represents a substantial danger to the community, as evidenced by the seriousness of his alleged criminal conduct, his recent erratic behavior and violent threats to his own family, and his acquisition of a firearm.

1. Defendant's Alleged Criminal Conduct Is Gravely Serious and His Malicious Intent Is Supported by Substantial Evidence

It is difficult to overstate the danger defendant poses to the community based on his alleged criminal conduct. A federal grand jury and the Honorable Karen L. Stevenson, Chief United States Magistrate Judge (who signed the criminal complaint) have found that there is probable cause to believe that defendant maliciously started what became the Palisades Fire, one of the most destructive fires in the region's history.²

As noted in the criminal complaint, a few months before he started the fire, defendant directed ChatGPT to generate an image, based on the following prompt: "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

² As noted above, the Court may consider whether the weight of the government's evidence increases the risk of nonappearance and/or the danger that defendant poses to the community. Motamedi, 767 F.2d at 1408. Here, the evidence summarized in the criminal complaint increases the risk of defendant's nonappearance, as well as the danger he poses to the community.

1 of thousands of people in poverty are trying to get past a gigantic
 2 gate with a big dollar sign on it. On the other side of the gate and
 3 the entire wall is a conglomerate of the richest people. They are
 4 chilling, watching the world burn down, and watching the people
 5 struggle. They are laughing, enjoying themselves, and dancing. The
 6 scene is detailed and impactful, highlighting the stark contrast and
 7 the direct connection between the different parts of the world.”
 8 (Complaint, ¶ 37(i).)

9 In response, ChatGPT produced the following image:



21 Further, in approximately August 2024, defendant wrote to
 22 ChatGPT that he “felt so liberated” upon burning a bible.
 23 (Complaint, ¶ 37(i).) Defendant’s fascination with fire is a
 24 chilling reminder of the danger defendant poses to the community.

25 2. Defendant Presents a Direct Threat to His Own Family
 26 Members and the Community at Large

27 The direct danger defendant poses to his sister’s family and is
 28 described in detail above. To recap: in just the past few months,

1 defendant threatened to shoot his brother-in-law in "self-defense"
2 with a firearm he recently purchased, he threatened to burn his
3 sister's home down, he erratically screamed at his sister in front of
4 her small children, and he stored his firearm inside a stuffed
5 animal, a few feet above the ground, in his sister's home where two
6 small children live and could easily have accessed it. (See
7 Alexander Decl., ¶ 9, Ex. H at 2.) Defendant's sister's and brother-
8 in-law's attempts to forbid defendant from possessing the firearm and
9 storing it in their home were futile; ultimately, defendant's
10 behavior and threats were so alarming that his sister and her family
11 had to call the police twice to report his conduct, and to inquire
12 about eviction proceedings. (See Alexander Decl., ¶ 2, Ex. A at 8-
13 13.) Defendant's sister even offered to pay defendant \$15,000 to
14 move out of her home, but he refused and claimed that this amount was
15 not sufficient. (See Alexander Decl., ¶ 6, Ex. E at 3.) For fear of
16 her own safety, and the safety of her husband and her children,
17 defendant's sister and her family were forced to move out of their
18 own home while defendant remained alone at the home. (See Alexander
19 Decl., ¶ 2, Ex. A at 13.) If defendant's family members did not feel
20 safe in his presence, no conditions or combination of conditions can
21 reasonable assure the safety of the community to whom defendant has
22 no allegiances.

23 3. Defendant Recently Acquired a Firearm and Is Therefore
24 Capable of Carrying Out His Violent Threats

25 Defendant purchased a Smith & Wesson .380 caliber pistol just
26 days after his September 19, 2025 altercation with his sister and
27 brother-in-law, and on the same day that he threatened to shoot his
28 brother-in-law in self-defense. Perhaps even more troubling, when

1 defendant was arrested in this case approximately one week later
2 (during a traffic stop), he had a loaded .380 caliber magazine for
3 this firearm in his pocket. (See Alexander Decl., ¶ 4, Ex. C at 3.)

4 According to defendant's sister, defendant was hiding his
5 possession of this firearm from her purposefully because defendant
6 believed that he "needed" the firearm due to his difficult
7 relationship with her husband. (See Alexander Decl., ¶ 2, Ex. A at
8 2.) Defendant was less forthcoming in his own post-arrest interview
9 with ATF agents, but he did confirm that something happened between
10 him and his brother-in-law that prompted him to purchase his firearm.
11 See Alexander Decl., ¶ 4, Ex. C at 3.)

12 Defendant's purchase of a firearm just days after -- and then on
13 the exact same day -- of family disputes that resulted in his
14 brother-in-law calling 911 for fear of the family's safety is
15 concerning. Such escalation, in combination with his mental decline
16 and the seriousness of his offense conduct, cannot be ignored by this
17 Court.

18 **D. Defendant Is Untrustworthy**

19 The Court should not trust defendant's representations about his
20 past conduct or his future ability to comply with conditions of
21 pretrial release. Defendant has a history of dishonesty, including
22 in this criminal case.

23 1. Defendant's Lies to Law Enforcement

24 As noted in the criminal complaint, defendant lied to law
25 enforcement during his interview on January 24, 2025. (See Complaint
26 ¶ 36(d).) When a federal agent asked defendant during the interview
27 where he was when he first saw the fire on January 1, 2025, defendant
28 claimed he was near the bottom of a hiking trail and called 911.

1 (Id.) In fact, cell phone geolocation data showed that defendant was
2 standing in a clearing 30 feet from the fire as it rapidly grew.
3 Defendant repeated that lie several times during the interview (see
4 id.) and maintained his position in his post-arrest interview with
5 ATF agents. (See Alexander Decl., ¶ 4, Ex. C at 2.)

6 2. Defendant's Lies to the Court in Florida

7 Defendant was not truthful during his interview with the
8 Pretrial Services Officer in Florida. Per the Pretrial Services
9 Report, defendant relayed that he "currently" lived at his sister's
10 house with his sister, brother-in-law, and her two children. (See
11 Alexander Decl., ¶ 5, Ex. D at 4.) That was false. As discussed in
12 detail above, due to defendant's dangerous and erratic behavior,
13 defendant's sister and her family had been forced to move out of
14 their own home the week before defendant's arrest for fear of their
15 safety. (See Alexander Decl., ¶ 2, Ex. A at 13.) Defendant also
16 told the Pretrial Services Officer that he possessed a firearm, and
17 that it was located in a lockbox in his sister's home. (See
18 Alexander Decl., ¶ 5, Ex. D at 4.) This was a lie too. As noted
19 above, defendant stored his firearm inside a stuffed animal in the
20 home's garage, just a few feet above the ground, despite the presence
21 of two young children in the home.³ (See Alexander Decl., ¶ 9, Ex. H
22 at 2.)

23 3. Defendant's Lie to a Witness on January 1, 2025

24 As set forth in the criminal complaint, defendant lied to a
25 witness about his whereabouts when the fire began on January 1, 2025.
26

27 ³ Defendant also told ATF agents in his post-arrest interview
28 that he possessed a .380 caliber firearm, which was located in a
"safe" place at his sister's home. (Alexander Decl., ¶ 4, Ex. C at
3.)

1 The witness encountered defendant near the fire at around 1:00 a.m.
2 on January 1. (See Complaint, ¶ 37(e).) The witness later told
3 investigators that defendant (whom the witness did not know) told him
4 that defendant had been down the hill at a house party when defendant
5 first saw the fire. (Id.) This was not true; geolocation data from
6 defendant's iPhone provider showed that defendant was approximately
7 30 feet away from the fire (and nowhere near any house party) when
8 the fire started. (Id.)

9 **E. Any Bond Package Proposed By Defendant Would Be**
10 **Insufficient**

11 Defendant moves this Court to reconsider Judge Hill's detention
12 order on the grounds that his parents are now willing to serve as
13 sureties to secure his appearance at future proceedings. Despite the
14 government's numerous requests to defense counsel for additional
15 information, defense counsel has not, as of the time of this filing,
16 informed the government of the proposed amount of any such bond, or
17 any other proposed conditions of release. Nevertheless, for all of
18 the reasons discussed herein, any bond in any amount, with any set of
19 conditions of release would be inadequate to mitigate the risks of
20 danger and flight.

21 Defendant's parents are particularly inappropriate to serve as
22 sureties here because defendant has had a strained relationship with
23 his parents, and a prior attempt by defendant's father to intervene
24 and neutralize defendant's erratic behavior was unsuccessful. (Id.,
25 ¶ 2, Ex. A at 10-12.) Given the frequent disputes between defendant
26 and his sister, defendant's father flew to Florida from France in
27 September 2025, at his daughter's request, in hopes of mediating the
28 situation. (Id. at 11.) Defendant's father, however, called 911 on

1 September 25, 2025 (as did defendant's brother-in-law) and expressed
2 concern regarding defendant's mental state and his possession of a
3 firearm. (Id. at 10.) When officers arrived at his daughter's home,
4 defendant's father told them that defendant told him that he had a
5 firearm, and if his brother-in-law "got on him," he would use it in
6 self-defense. (Id. at 11-12.) Defendant's father also relayed that
7 he was concerned that defendant possessed this firearm and was
8 "clearly not afraid to utilize it." (Id. at 12.) Defendant's father
9 may take a different position now with respect to defendant's ability
10 to comply with bond conditions, but before he became aware of federal
11 charges in this case, he believed his son was a danger and called law
12 enforcement for assistance as a result.

13 Given the extent of the harm and devastation caused by
14 defendant's alleged offense conduct, his recent erratic behavior, his
15 recent threats of violence made to his own family members, and his
16 unstable housing and employment status, and what appears to be a
17 decline in mental condition, there is no amount of bail or other
18 conditions of release that could reasonably assure the safety of the
19 community or mitigate the risk of his nonappearance at future
20 proceedings. As Judge Hill aptly recognized, "it doesn't take very
21 long to cut off an ankle monitor and flee." (Alexander Decl., ¶ 2,
22 Ex. A at 54.) Moreover, defendant has repeatedly lied to both law
23 enforcement and Probation, and this Court should not trust defendant
24 to work with Probation and abide by any conditions of release it
25 would impose. Judge Hill correctly determined, after hearing
26 extensive argument and testimony from an ATF agent, that defendant
27 should remain detained pending trial. This Court should hold the
28 same. 18 U.S.C. § 3142(e)(1); see Rep. No. 225, 98th Congress, 1st

Sess. 1983, 1984 U.S.C.A.N. 3182, 3198-99 (n.60) (Congress finding that "a defendant who is a danger to the community remains dangerous even if he has posted a substantial money bond").

IV. CONCLUSION

For the foregoing reasons, the government respectfully requests that this Court maintain the order detaining defendant pending trial.

Dated: November 14, 2025

Respectfully submitted,

BILAL A. ESSAYLI
First Assistant United States
Attorney

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

/s/

MARK A. WILLIAMS
MATTHEW W. O'BRIEN
LAURA A. ALEXANDER
DANBEE C. KIM
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF LAURA A. ALEXANDER

1
2 1. I am an Assistant United States Attorney for the Central
3 District of California and I have been assigned to represent the
4 United States of America in this matter. If called to testify, I
5 could and would testify truthfully to the statements contained
6 herein.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of
8 the transcript of the October 9, 2025 detention hearing that took
9 place in the Middle District of Florida, before the Honorable U.S.
10 Magistrate Judge Nathan Hill.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of
12 a Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") report
13 and excerpts of text communications between the defendant and his
14 friend in September 2025.

15 4. Attached hereto as **Exhibit C** is a true and correct copy of
16 an ATF report related to defendant's post-arrest interview.

17 5. Attached hereto as **Exhibit D** is a true and correct copy of
18 defendant's Pretrial Services Report, dated October 23, 2025.

19 6. Attached hereto as **Exhibit E** is a true and correct copy of
20 an ATF report regarding an interview of defendant's sister, L.W., on
21 October 7, 2025.

22 7. Attached hereto as **Exhibit F** is a true and correct copy of
23 an ATF report regarding a September 19, 2025 domestic disturbance at
24 between defendant and his family in Melbourne, Florida.

25 8. Attached hereto as **Exhibit G** is a true and correct copy of
26 an ATF report regarding a September 25, 2025 domestic disturbance at
27 between defendant and his family in Melbourne, Florida.

28 9. Attached hereto as **Exhibit H** is a true and correct copy of

1 an ATF report related to ATF agents' recovery of defendant's firearm
2 on October 7, 2025.

3 10. Attached hereto as **Exhibit I** is a true and correct copy of
4 an ATF report regarding an October 24, 2025 traffic stop of defendant
5 in Palm Bay, Florida.

6 11. Attached hereto as **Exhibit J** is a true and correct copy of
7 an ATF report and excerpts of an interview of defendant's friend,
8 M.H.

9 I declare under penalty of perjury under the laws of the United
10 States of America that the foregoing is true and correct and that
11 this declaration is executed at Los Angeles, California, on November
12 17, 2025.

13 /s/ Laura A. Alexander

14 LAURA A. ALEXANDER
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF COMPLIANCE

The undersigned, counsel of record for the United States of America certifies that this brief contains 4,932 words, which complies with the word limit of L.R. 11-6.1.

Dated: November 17, 2025

Respectfully submitted,

BILAL A. ESSAYLI
First Assistant United States
Attorney

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

/s/

MARK A. WILLIAMS
MATTHEW W. O'BRIEN
LAURA A. ALEXANDER
DANBEE C. KIM
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA