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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEANDRE WILSON

Defendant.

No. CR 24-621(B)-MWF-2

GOVERNMENT'S OPPOSITION TO
DEFENDANT WILSON'S APPLICATION FOR
REVIEW OF DETENTION ORDER

Plaintiff United States of America, by and through its counsel
of record, the United States Attorney for the Central District of
California and Assistant United States Attorneys Ian V. Yanniello,
Daniel H. Weiner, and Micheal J. Morse hereby files its opposition to
defendant's Application for Review of the Detention Order.

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1 This filing is based upon the attached memorandum of points and
2 authorities, the files and records in this case, and such further
3 evidence and argument as the Court may permit.

4 Dated: June 3, 2026

Respectfully submitted,

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

8 IAN V. YANNIELLO
9 Assistant United States Attorney
10 Chief, National Security Division

11 /s/
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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Deandre Wilson's application for bond reconsideration is premised on the Government's decision to bring additional murder charges arising from the execution-style murder that defendant and his co-conspirators committed on August 19, 2022. Defendant also falsely suggests that his role in the Los Angeles murder "is materially subordinate to every other charged defendant." (Dkt. 412 at 2.) Both arguments lack merit, and should be rejected.

Indeed, the facts before the Court only strengthen the case for detention. Defendant allegedly committed the charged murder while released on bond facing separate murder charges in Chicago. Defendant was later acquitted of that conduct, but his criminal history, including pending state charges for aggravated unlawful use of a weapon, establish his continued dangerousness.

Defendant's leadership role in the charged murder further supports denying his request for bond reconsideration. Defendant is charged with recruiting other hitmen to travel across the country to hunt and kill T.B., a rival of defendant Banks. Defendant and the other hitmen then traveled to California to carry out the brazen, premeditated gang murder. Once they arrived, defendant and his co-conspirators used two vehicles to track and stalk T.B. from the night of August 18 until the afternoon of August 19 --- when the murder occurred. Specifically, after tracking the rival to a busy gas station in Beverly Hills, three of defendant's co-conspirators opened fire with multiple firearms --- including a machine gun --- missing their intended target and instead murdering S.R.

1 Surveillance video shows that less than 45 minutes later, while
2 S.R.'s bullet-riddled body was being removed from a vehicle,
3 defendant was ordering food and laughing with his co-conspirators, as
4 depicted in the screenshot below.



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22 (USAO_MEDIA-Bates 269.)

23 This is not a close case. The evidence of defendant's guilt is
24 significant and includes testimony from multiple witnesses, text
25 messages showing defendant recruited others to commit the crime, and
26 other evidence showing defendant's leadership role in the alleged
27 gang enterprise. Defendant's willingness to commit murder while on
28 pretrial release **for murder** demonstrates a complete disregard for the

1 law and establishes that he poses an extraordinary danger to the
2 community. Contrary to defendant's position, the government's
3 decision to bring new charges¹ alleging additional murder and violent
4 crimes committed by defendant's gang enterprise is not mitigating. No
5 condition or combination of conditions can reasonably assure either
6 the safety of the community or Defendant's appearance. The
7 application should be denied. See 18 U.S.C. § 3142(e)(1) (defendant
8 must be detained pending trial where "no condition or combination of
9 conditions will reasonably assure the appearance of the person as
10 required and the safety of any other person and the community");
11 United States v. Liebowitz, 669 F. App'x 603, 604 (2d Cir. 2016)
12 (affirming detention order even though murder-for-hire defendant "had
13 never previously been charged with a violent crime" because the
14 "record contains compelling evidence of [defendant]'s participation
15 in the charged crimes and his knowledge and acquiescence in the use
16 of violence to commit them" which "admits a clear and compelling
17 finding that he posed a threat of future harm"); United States v.
18 Barone, 387 F. App'x 88, 89-90 (2d Cir. 2010) (affirming detention
19 order for defendant whose danger to the community "was clearly and
20 convincingly evidenced by . . . his readiness to commit the charged
21 murder-for-hire").

22 **I. CONCLUSION**

23 Defendant's release would pose a grave risk to the safety of the
24 public, and witnesses and potential witnesses in this case. No
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26 ¹ As defendant noted in his filing, for transparency and in
27 light of the August 20 trial date, the government informed defense
28 counsel that it intended to bring additional charges, including
Murder in Aid of Racketeering (VICAR murder), in violation of 18
U.S.C. § 1959(a)(1), and Conspiracy to Commit Stalking, in violation
of 18 U.S.C. § 371.

1 condition or combination of conditions can ensure defendant's
2 appearance or mitigate his danger to the community. The Court should
3 order defendant detained.
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