

Exhibit 2

Juan Esco, Letter to Victims' Rights Ombudsman, dated April 8, 2025

JUAN ESCO

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VIA CERTIFIED MAIL

April 8, 2025

Victims' Rights Ombudsman

Executive Office for United States Attorneys
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530-0001

Re: Crime Victims' Rights Act (18 U.S.C. § 3771) — Enforcement Petition and Request to Reopen Dismissed Murder-for-Hire Charge
United States v. Fereidoun Khalilian — Case Nos. 2:23-cr-00331-DSF (C.D. Cal.) & 2:23-cr-00222-RFB-NJK (D. Nev.)

To Whom It May Concern:

I am writing to formally assert and enforce my rights under the *Crime Victims' Rights Act (CVRA)*, 18 U.S.C. § 3771, in response to what I believe to be a *profound miscarriage of justice* — the quiet dismissal of a federal murder-for-hire charge against the man who attempted to have me killed. Despite overwhelming FBI-confirmed evidence, this charge was abandoned without any input from me as the intended victim.

This letter serves three purposes:

1. to formally enforce my rights under the *CVRA*;
2. to notify the Department of a potential violation of my rights when the charge under 18 U.S.C. § 1958 was dismissed on July 15, 2024, without notice or opportunity to be heard;
3. to petition the Department to reopen and reinstate the murder-for-hire charge, supported by overwhelming evidence, FBI-confirmed recordings, and substantial public interest in justice.

BACKGROUND OF THE CASE

On March 28, 2023, a criminal complaint was filed in the Central District of California, Case No. 2:23-cr-00331-DSF (C.D. Cal.), charging Mr. Khalilian with murder-for-hire under 18 U.S.C. § 1958, based on a detailed FBI investigation. This included:

- Recorded threats from Mr. Khalilian to mutilate and murder me (March 8, 2023)
- A staged murder scene executed with full FBI knowledge and cooperation of a confidential informant (M.S.)
- Monitored WhatsApp and phone communications, in which Mr. Khalilian confirmed he wanted me killed, asked if the body would be found, and declined a “souvenir”
- Electronic transfers totaling \$12,500 from Mr. Khalilian to M.S., including \$4,000 sent to an FBI-controlled Zelle account on March 23, 2023

The government's own affidavit, submitted by FBI Special Agent Michael Fukuda, confirmed that every element of the *18 U.S.C. § 1958* offense was satisfied — including the use of interstate commerce, the offer and transfer of payment, and the clear intent to have me murdered. Mr. Khalilian was arrested on June 21, 2023, in Las Vegas, Nevada, following a monitored FBI sting operation. He made his initial appearance in Nevada under Case No. 2:23-cr-00222-RFB-NJK and was denied pretrial release.

Despite this overwhelming evidence — including recorded threats, financial transfers, coordinated law enforcement action, and Mr. Khalilian's belief that the killing had occurred — the murder-for-hire charge was dismissed on July 15, 2024, as part of a revised plea agreement in which only witness tampering remained. I was never consulted, never notified, and never given an opportunity to be heard. The decision to drop this charge represents not merely a procedural oversight, but a betrayal of the very protections the CVRA was designed to ensure.

CVRA VIOLATIONS

Under *18 U.S.C. § 3771(a)*, I was entitled to:

- (3) be reasonably heard at any public proceeding involving release, plea, sentencing, or dismissal;
- (5) confer with the attorney for the Government;
- (8) be treated with fairness and with respect for my dignity and privacy.

The dismissal of the charge without any notice, explanation, or outreach — despite my many written communications to DOJ offices — constitutes a clear violation of these rights. The government's failure to notify me or consult me at any stage of this outcome violates not only the letter of the *CVRA*, but also its very spirit: to prevent exactly this kind of silent, unilateral decision that leaves victims excluded, disregarded, and unprotected.

PETITION TO REOPEN AND REFILE THE CHARGE

I hereby petition the Department of Justice to reopen the murder-for-hire charge under the authority of:

- The *CVRA*, which authorizes remedies for enforcement when violations occur;
- The Department's obligation to ensure that victim interests are protected in criminal proceedings;
- The availability of new and previously underutilized evidence, including FBI-monitored recordings, WhatsApp messages, and corroborated witness statements that support reinstatement.

Mr. Khalilian paid money believing I had been killed. He confirmed the act and asked for details. No reasonable juror would find that anything less than solicitation of murder for hire under the law. This case should not have been *quietly dismissed* — it should have gone to trial or been resolved with victim input.

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Failure to revisit this decision not only leaves me at continued risk, but sends a dangerous message: that even a fully documented murder-for-hire plot can be quietly bargained away, without trial, and without the victim's knowledge.

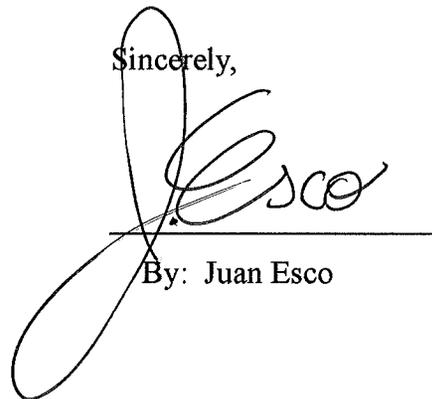
REQUESTED ACTION

I respectfully request that the Department of Justice:

1. formally acknowledge the *CVRA* violation and provide a written explanation of the rationale for dismissing the charge;
2. investigate whether prosecutorial discretion was exercised appropriately in this matter;
3. reopen and refile the *18 U.S.C. § 1958* charge, based on the overwhelming evidence, renewed public interest, and the principle of equal justice;
4. assign an official DOJ representative to meet or confer with me directly regarding this matter.

I am prepared to submit any supporting documentation upon request. All relevant materials, including the criminal complaint, FBI recordings, and court filings, are part of the official record and may be accessed electronically through the federal case dockets. I reserve the right to pursue further remedies, including judicial review under the *CVRA*, if this petition is ignored or improperly denied. Please confirm receipt of this letter and contact me at your earliest convenience. I trusted that the system would protect me and cooperated with federal authorities at great personal risk. I am now asking only that the system honor the rights and legal protections I am owed under federal law.

Sincerely,



By: Juan Esco