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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 BRADLEY EARL REGER,
14 Defendant.

Case No. 2:23-mj-0099 DB
UNITED STATES' MOTION FOR DETENTION

15 **I. INTRODUCTION**

16 Defendant Bradley Earl Reger has been charged with Engaging in Illicit Sexual Conduct in
17 Foreign Places, in violation of 18 U.S.C. § 2423(c). As explained below and in the criminal complaint,
18 defendant has a long history of sexually abusing minor victims. The United States respectfully requests
19 that this Court order him detained pending trial. Because the defendant is facing significant time in
20 prison, has demonstrated a long-standing pattern and history of sexual offenses committed against
21 minors (both in the United States and abroad), has the means to live comfortably abroad, and has
22 traveled abroad extensively for many years, there are no conditions or combination of conditions that
23 will reasonably assure the appearance of the defendant or the safety of the community.

24 **II. LEGAL STANDARD**

25 Under 18 U.S.C. § 3142(e)(3)(E), there is a presumption that no condition or combination of
26 conditions will reasonably assure the safety of any other person and the community because defendant's
27 crime involves a minor victim under section 2423 of Title 18.
28

1 The rebuttable presumption in 3142(e) shifts to the defendant the burden of producing evidence
2 that the defendant is not a flight risk and not a danger to the community. *See United States v. Rueben,*
3 974 F.2d 580, 586 (5th Cir. 1992). Even if the defendant presents contrary evidence, the Court should
4 weigh the presumption in favor of pretrial detention as one of the factors to be considered along with
5 those set forth in 3142(g). *United States v. King,* 849 F.2d 485, 488 (11th Cir. 1988).

6 In determining whether there are conditions of release that will reasonably assure the defendant's
7 appearance and the safety of any other person and the community, the Court must take into account:

8 (1) the nature and circumstances of the offense charged, including whether the offense
9 is a crime of violence, a federal crime of terrorism, or involves a minor victim or a
controlled substance, firearm, explosive, or destructive device;

10 (2) the weight of the evidence against the person;

11 (3) the history and characteristics of the person, including the person's character,
12 physical and mental condition, family ties, employment, financial resources, length
of residence in the community, community ties, past conduct, history relating to
13 drug or alcohol abuse, criminal history and record concerning appearance at court
proceedings; and

14 (4) the nature and seriousness of the danger to any person or the community that would
15 be posed by the person's release.

16 18 U.S.C. § 3142(g).

17 Courts across the Circuit and country recognize the clear and present danger posed by defendants
18 similarly situated to the instant Defendant. *See United States v. Yoeun,* CR19-5148-BHS, Dkt. No. 11 at
19 6 (W.D. Wash. Mar. 13, 2019) (“Even with stringent conditions such as electronic home monitoring, it
20 would not be possible to control the defendant's access to the internet[.]”); *United States v. Santiago-*
21 *Muniz,* No. 3:17-CR-326, 2017 WL 6028347, at *3 (M.D. Pa. Dec. 5, 2017) (“Preventing th[e] type of
22 highly predatory and addictive sexual behavior which may be completed in relative secrecy with any
23 number of devices that can connect to the internet is simply beyond the capacity of pretrial services to
24 effectively monitor.”); *United States v. Petersen,* No. 17-CR-00259-CRB-1/JD, 2017 WL 2179591, at
25 *4 (N.D. Cal. May 17, 2017) (where defendant's “modus operandi was to induce trust and betray it” with
26 children he babysat, his “commitment to that tactic, and his success with it, raise insurmountable
27 concerns that he cannot be trusted to adhere to conditions restricting his behavior.”); *United States v.*
28 *Brugnoli-Baskin,* No. 2:22-mj-00499, 2022 WL 16636429 (W. D. Wa. Nov. 2, 2022) (detaining a

1 defendant before trial based on his abuse of a position of trust used to facilitate sexual exploitation of
2 minors).

3 **III. FACTS SUPPORTING DETENTION**

4 For more than a decade, the defendant sexually abused over a dozen teenage boys while in a
5 position of trust, as a licensed Nurse Practitioner, and as a leader of missionary trips associated with his
6 church. Using his status as a nurse practitioner and church leader, he groomed vulnerable victims with
7 jobs, gifts, money, and trips. He conducted countless sexually abusive physical “exams” of these boys
8 in his clinic in Susanville, in hotel rooms across the United States and in other countries, and even inside
9 of vehicles. He would entice his victims to travel with him to other states and other countries by
10 promising exciting trips involving religious service, outdoor adventure, and often paying for those trips.
11 Those trips provided defendant with the opportunity to repeatedly touch the naked genitals of his victims
12 for his own sexual pleasure. There are likely many more victims that will be confirmed following the
13 defendant’s arrest.

14 Different minor victims remember defendant penetrating their anuses with his fingers,
15 sometimes forcibly holding them down while he did so. Multiple victims stated that defendant required
16 them to ejaculate, claiming he needed to test their semen, and he would often touch their naked, erect
17 penises under the guise of a medical “exam.” These sexually abusive exams took place in the
18 defendant’s “clinic” in Susanville, California, in different states, and in foreign countries. Defendant
19 would use concerns about moles on skin, about hypothermia, about chlorine eye irritation, about
20 intestinal problems all as pretenses to conduct “exams” and touch minors’ naked genitals.

21 One minor victim had stomach problems that defendant claimed were the result of a hydrocele.
22 Defendant repeatedly used a device called a doppler ultrasound to stimulate blood flow to that victim’s
23 testicles and penis, Defendant would use that device on the victim approximately once per month and
24 before each trip. During the execution of the search warrant in the “clinic” inside defendant’s
25 commercial building on July 6, 2023, agents found the doppler device. Agents also located physical
26 exam forms with victims’ names on them, as some victims mentioned during their interviews. Agents
27 also located a rubber-type mold of testicles that some victims described the defendant using as he taught
28 them to do self-examinations of their genitals. Agents found close-in color photographs of moles on

1 skin, some of which had victims' names and dates on them. They also located forms containing body
2 diagrams where moles of concern were marked, matching victims' descriptions. Agents found sexual
3 lubricant (KY Jelly) next to the examination table, as many victims described in their interviews. They
4 located flyers for the "mission" trips that victims described the defendant organizing, and during which
5 the defendant sometimes sexually abused victims.

6 **IV. THE VICTIMS URGE DETENTION**

7 Under the Crime Victims' Rights Act, 18 U.S.C. § 3771(a)(4), a victim has a right to be
8 reasonably heard at any public proceeding involving release. The victims in this case strongly oppose
9 the release of the defendant. The undersigned prosecutor and case agents were able to speak with some
10 victims the day after defendant's arrest, and solicit their views on whether the defendant should be
11 detained or released.

12
13 Victim #1, after being contacted on July 7, 2023 and informed of defendant's arrest, wrote:
14 The victims of Brad Reger that I know personally number over 100. I know of dozens of others
15 that I've never met in person, and I have very good reason to believe that there are many more
16 than that all across the world that I know nothing about. These people are direct results of the
17 several decades of this man's crimes that have gone unpunished. They help to establish a pattern
18 of Brad Reger's consistent manipulation, exploitation, endangerment, and abuse of children.
19 Everywhere on the planet that he goes, he has connections and resources that he uses to commit
20 crimes. Every minute that he is not incarcerated is a minute that he can use to do whatever he
21 wants. Brad Reger has destroyed the lives many of the people that I'm closest to, and I've seen
22 what his damage has done to so many others besides myself. I've slept very uneasily for over a
23 decade knowing that Brad was out there free and able to do whatever he wanted to do, whenever
24 he wanted to do it. I'd like to know, for the first time in my entire existence, that the man who
25 ruined my life is finally in a place where he can't hurt anybody else, and finally try to get some
26 good sleep.

27 Victim #2 conveyed the following views over the phone: If the defendant were released, he
28 would find a way to continue to abuse children. I would feel a lot better if he were detained. I would be
concerned to see him in the community. Victim #2 is concerned that his family is in the same circles as
the defendant.

29 Victim #8, after being contacted on July 7, 2023 and informed of defendant's arrest, wrote:
Bradley Reger should be detained. Any other action would be brazen stupidity, and a dangerous
insult to every single victim and their families.

- He knows where my family lives, now he has the motive to hurt them.
- He has the motive to destroy evidence...and the means.
- He has the motive and resources to flee the country and escape justice...and he will do
it.

1 •He has documented abusive behavior, from mental manipulation and grooming, to
physical and sexual abuse...he WILL continue these if not detained.

2 •He has contact with many youth and young men through his social media accounts and
internet accessible devices...he will contact them...he will threaten them.

3 Brad told me once that if someone ever broke into his house he would “shoot them in the
4 head, then shoot the wall behind them in order to make it look like he feared for his life.” This
is not a safe man, this man is evil...and has committed horrible sexual crimes all over the world
5 and dragged his victims along with him. What answer will you, judge, give to the families of his
next victim if he is not detained?

6 There is not a day and often not even an hour that goes by, where I do not think about the
abuse I went through...the humiliation, the fear...the coldness of his soul or the sound of his
7 voice...the feeling of his skin on mine, and the sound of his breath. It haunts me. He should not
be allowed to walk out of this courtroom and terrorize the community. He must be detained for
8 the safety of all. Any other action would be inexcusable, and itself evil. Do not let this man walk out
of this courtroom.

9
10 **V. ARGUMENT**

11 **A. 18 U.S.C. § 3142(g)(1) - The Nature and Circumstances of the Offense Support**
12 **Detention**

13 The criminal complaint in this case charges defendant with a serious child exploitation offense:
14 engaging in illicit sexual conduct in foreign places. That crime carries a statutory maximum term of
15 imprisonment of thirty years. Defendant’s conduct was aggravated. The minor victim for the count in
16 the criminal complaint was only 12 years old when the defendant isolated him and sexually abused him
17 in a hotel room in the Philippines, during a “medical mission” trip. Defendant continued that pattern of
18 abuse of Minor Victim #3 many times, asking him to get an erection and handling the victim’s erect
19 penis with his hand, claiming he was inspecting for moles.

20 But Minor Victim #3 was not alone as the victim of defendant’s sexual abuse under the guise of
21 supposed medical care. As set forth in the criminal complaint, defendant sexually abused more than a
22 dozen male patients between the ages of twelve and twenty-two under the guise of conducting purported
23 medical examinations at his medical clinic in Susanville, CA, and in hotel rooms and camp sites all over
24 the world. Investigators learned that allegations of defendant sexually abusing minors had been
25 investigated by local law enforcement dating back to 2003, 2006 and 2007. Defendant’s position as a
26 nurse practitioner, as an organizer of church mission trips, and as a business owner provided him access
27 to teenagers and the opportunity to sexually abuse them. The community that defendant lives in is a
28

1 small one, in rural northeast California, and if he is released, there is a high probability that he and some
2 of his victims (or their family members) will cross paths.

3 Defendant's crimes had a seriously negative and lasting impact on some of his victims. One of
4 the victims (not Minor Victim #3) wrote an online public letter titled: "A Long Personal Letter to the
5 Man Who Sexually Abused Me as a Child." Exhibit 1. That letter sets out the devastating and long-
6 lasting emotional consequences that the victim has suffered as a result of defendant's crimes against him,
7 and the guilt he feels for not being able to stop the defendant from abusing other minor children.

8 Another minor victim guessed which victim had written the open letter and said that "those experiences
9 [of the author of the letter] are pretty much on point with what I experienced..." The serious nature and
10 circumstances of defendant's criminal conduct warrants detention.

11 **B. 18 U.S.C. § 3142(g)(2) - The Weight of the Evidence Supports Detention**

12 The evidence against defendant is very strong. So far, the investigation (which includes
13 information gathered by a third-party investigation organization prior to the joint federal law
14 enforcement investigation) has identified more than a dozen victims of defendant's sexual abuse, dating
15 back many years. These victims, who have been separately interviewed, tell similar stories of defendant
16 isolating them, choosing some of them for special treatment, groping their genitals, and giving them
17 invasive and long hugs after conducting sexually abusive "exams." The victims' accounts are
18 consistent, specific, and corroborated by other evidence, such as travel records, electronic
19 communications, bank records, mission trip photographs, items found at defendant's "clinic" during a
20 search warrant execution, as well as the accounts of other victims. Although not the most important
21 detention factor, the strength of the evidence in this case favors detention.

22 **C. 18 U.S.C. § 3142(g)(3) - History and Characteristics of Defendant**

23 Defendant's history of conduct demonstrates very clearly for the Court that he poses a
24 substantial, real danger to the community. Before his arrest, he repeatedly sought out positions of trust
25 and authority with children, and Defendant abused those positions with at least one child to sexually
26 exploit him. That demonstrated and realized sexualized interest in minor will continue to exist as long as
27 Defendant is released into the community. The crimes charged are not only crime of violence but also
28 crimes against minor victims, which is a particularly vulnerable group unable to defend themselves. That

1 Defendant chose this particular subset of victim to prey upon only heightens the danger that Defendant
2 poses to the community. And because the charged offenses “entail the sexual exploitation of children,”
3 they are among “the gravest and most serious crimes that a defendant can be charged with.” *United*
4 *States v. Petersen*, No. 17-CR-00259-CRB-1/JD, 2017 WL 2179591, at *4 (N.D. Cal. May 17, 2017).

5 Defendant's history and characteristics further support detention. In terms of past conduct, for
6 over a decade, he has perpetrated repeated sexual abuse of minors, in the guise of medical “exams.” He
7 used his position of authority as a respected church member, as the leader of church-affiliated mission
8 trips, as a successful business owner, and as a nurse practitioner to groom children and continually grope
9 their naked genitals for his own sexual pleasure.

10 Further, defendant has an extensive history of domestic and international travel, and presents a
11 serious risk of flight and non-appearance at future court hearings. He has the financial means and travel
12 history and international connections to disappear to another country, and the likelihood of a lengthy
13 prison sentence to deter him from appearing in court. Exhibit 2 summarizes defendant’s astonishing 235
14 international travels between 2004 and 2023. As recently as June of 2023, the defendant traveled to
15 Ireland and the United Kingdom for over two weeks, and he was arrested on July 6, 2023 after returning
16 from a trip to Colorado. Defendant’s foreign travel history includes destinations such as Dominica,
17 Ukraine, Poland, Spain, Ireland, U.K., Philippines, South Korea, Czech Republic, Japan, Qatar, Iceland,
18 Israel, France, Germany, UAE, Jordan, the Netherlands, Ghana, Hong Kong, Finland, Senegal, Mexico,
19 Haiti, China, Canada, Hungary, Singapore, Trinidad and Tobago, Belize, and Kenya. HSI and FBI have
20 conducted several interviews of victims in which they describe abuse occurring overseas in countries
21 such as Poland, Ukraine, and the Philippines. During the search of defendant’s commercial property,
22 agents found a file drawer filled with photocopies of passports of young men, many of whom are victims
23 in this case, as well as travel and immigration documents.

24 Even if the Court were to order defendant to surrender his passport to Pretrial Services and be
25 electronically monitored, other defendants in this district have managed to flee the country while on
26 pretrial release under similar conditions. *See United States v. Ruslan Kirilyuk* (14-083-GEB) (fled to
27 Mexico the week of trial, and codefendant Maslov also fled while on pretrial release but stayed in the
28 US); *United States v. Constantine Pappadopoulos* (fled to Greece in 1993 while awaiting a verdict in an

1 arson case, despite surrendering his passport to the court, called from Greece to say he would not be
2 coming back, and is still a fugitive: [https://www.latimes.com/archives/la-xpm-1993-07-05-mn-10259-
4 story.html](https://www.latimes.com/archives/la-xpm-1993-07-05-mn-10259-
3 story.html)); *United States v. Yaniv and Orel Gohar* (2:17-cr-232 GEB) (co-defendant brothers who fled
5 to Israel while on pretrial release and had to be extradited back to this country:
6 [https://www.justice.gov/usao-edca/pr/extradited-israeli-fugitive-sentenced-illegal-gambling-business-
8 money-laundering-and](https://www.justice.gov/usao-edca/pr/extradited-israeli-fugitive-sentenced-illegal-gambling-business-
7 money-laundering-and)); and *United States v. Erasmo Solorzano* (21-cr-109 DAD) (defendant asked to
9 access his passport in order to renew his driver license and fled the country on pretrial release).

10 Defendant has substantial financial assets that could facilitate his flight from this court (his credit
11 card statements from the time he was abusing minor victims sometimes revealed tens of thousands of
12 dollars of transactions in a single month, and certain victims were trusted to carry thousands of dollars in
13 United States currency during international trips - for the defendant). While defendant has a lengthy
14 history of residence in northern California, and family and property ties to this district, the government
15 believes that those ties are more than offset by his lengthy history of sexual abuse crimes against minors,
16 and ability to abscond from pretrial supervision and perhaps never be brought to justice. Overall,
17 defendant's history and characteristics, as a long-term child sexual abuser, warrant detention.

18 **D. 18 U.S.C. § 3142(g)(4) – Danger Posed by Defendant's Release**

19 If released, defendant could pose a significant risk of danger to his prior victims, and future
20 victims, and those victims the government has not yet identified. It bears repeating that defendant
21 sexually abused many different victims over many years, and he never seemed to run out of teenage
22 boys whose genitals he could fondle under the guise of medical "exams." Two of the victims told
23 interviewers that, years after they were abused and shortly before their weddings, defendant met with
24 them and counseled them on how to sexually please their wives. For one of those victims, shortly before
25 he got married, defendant gave him an "exam" as he had in the past. On the night before his arrest,
26 while at the Reno airport, the defendant was attempting to engage a young girl (whom he did not appear
27 to know) in a conversation. Information from Facebook indicates that in June of 2023, defendant was
28 exchanging messages with someone associated with an orphanage in Kenya, where he had previously
traveled.

Defendant has multiple firearms registered to him according to firearms registry records

1 accessible to law enforcement. One firearm was seized by local law enforcement at his residence during
2 the search warrant execution last night, for safekeeping. The registry records also indicate that his adult
3 son, who lives in the area, and his brother, who is a nearby neighbor, also (lawfully) own firearms.
4 Given the statement that defendant made to Victim # 8 about how he would shoot a burglar in the head,
5 then shoot the wall behind the burglar to make it look like he feared for his life, the accessibility of
6 firearms if released is a serious concern to the safety of others.

7 No special conditions this Court can impose would sufficiently mitigate the danger that
8 Defendant poses due to potential community access to minors and to electronic devices capable of
9 further communicating with, and exploiting or sexualizing, minors. Location monitoring subject to
10 global positioning technology cannot enable Pretrial Services to determine his proximity to minors.
11 Further, if released, defendant would be living in a small community and may seek to leave for any
12 number of reasons, including appointments and legal reasons, which may put him in further close
13 proximity to minors and some of his victims. Although conditions could aim to bar Defendant from
14 possessing computers or accessing the Internet, as this district has experienced recently, Pretrial
15 Services, despite their best efforts, has limited ability to ensure full compliance with that condition,
16 especially given technology-savvy offenders like the one in this case. As the Ninth Circuit discussed in
17 *United States v. Hir*, 517 F.3d at 1092–93, it is extremely difficult to control a defendant's access to
18 computers or the internet: internet-capable devices are ubiquitous in our society. Finally, the Court may
19 impose a search condition, but this would likely still require Pretrial Services to develop reasonable
20 suspicion of contraband or evidence of a violation of a condition of supervision.

21 Defendant has shown that he is adept at selecting victims, grooming them for his abuse, and
22 repeatedly groping their genitals for his sexual pleasure. He poses an ongoing risk of danger to the
23 public if released from custody.

24 VI. CONCLUSION

25 Defendant remains a danger to other persons and the community, and cannot overcome the
26 presumption of detention in this case. The primary victims in the case strongly oppose his release, and
27 express serious concerns about what could happen if he were to be released. Considering the nature and
28 circumstances of the instant offense, the weight of the evidence against Defendant, Defendant's

1 characteristics, and his danger to the community, there are no conditions of release that will reasonably
2 assure the safety of any person and the community. He should be detained pending trial.

3
4 Dated: July 7, 2023

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5 By: /s/ Christina McCall
6 CHRISTINA McCALL
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