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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES,

Plaintiff,

v.

ANIBAL HERNANDEZ SANTANA,

Defendant.

CASE NO. 2:25-MJ-0131-JDP

SUPPLEMENT TO UNITED STATES' MOTION
FOR DETENTION (ECF 6)

Date: September 25, 2025

Time: 2:00 p.m.

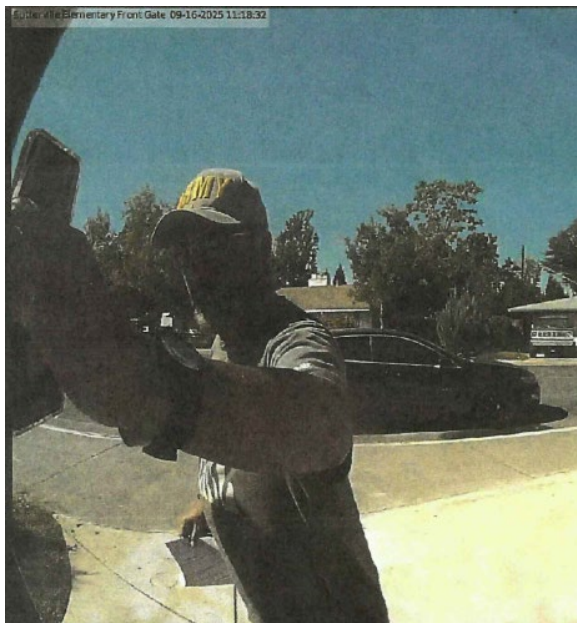
Judge: Hon. Chi Soo Kim

As explained in the United States' detention motion (ECF 6), Hernandez Santana clearly established the danger he poses to the community when, on September 19, 2025, he stood in a school zone and shot a firearm once into the air in the direction of the KXTV/ABC 10 station, and then drove around the block to fire three more times directly into the lobby of the station. The building was occupied at the time, but luckily no one was injured. The United States now supplements its original detention motion to bring additional—and highly concerning—facts to the Court's attention that further demonstrate the dangerousness he poses if released.

I. Three days before Hernandez Santana shot at and into the KXTV/ABC News 10 station, he visited a different nearby elementary school with an unusual request that "frightened" school staff and teachers.

The KXTV/ABC 10 station that Hernandez Santana fired multiple bullets at and into is located less than 1,000 feet away from Leataata Floyd Elementary School and Health Professions High School. Only three days before the shooting, Hernandez Santana walked in unannounced to a different nearby elementary school.

In the morning of Tuesday, September 16, 2025, Hernandez Santana entered the closed campus and walked into the school office of a different elementary school in the Land Park neighborhood area, which was only about 2.5 miles away from the location of the shooting. The school was in session at the time. Martinez Santana was dressed in what witnesses described were military-looking pants, an army cap, and dark sunglasses:



1 Inside the office, he spoke to a school employee. This employee described Hernandez Santana's
 2 behavior as "weird" and "anxious." Hernandez Santana frequently tapped on the counter and looked
 3 behind the employee, as if he was trying to see if anyone else was in the office. He asked the school
 4 employee if he could read to the children. The school employee told him that wasn't possible, and that
 5 if he wanted to volunteer at the school, he would need to be cleared and speak to the school's office
 6 manager when she returned. Hernandez Santana, however insisted that he wanted to volunteer that day.
 7 The school employee again told him that was not possible. Hernandez Santana then left a note for the
 8 school's office manager in which he stated, "I would like to read to young students in my spare time."
 9 Afterwards, he left the campus at the school employee's direction.

10 Hernandez Santana's visit to the elementary school that day frightened several school staff
 11 members and teachers,¹ who, on September 24, reported this incident to the FBI after seeing media
 12 coverage about the KXTV/ABC 10 shooting. One school employee reported that she "barely
 13 recognized him" that day and he appeared "very out of character." Their concerns are plain: "If he gets
 14 out of custody, we are scared for our school's safety."

15 **II. The KXTV/ABC 10 shooting was "the Next Scary Thing" for Hernandez Santana.**
 16 **The threatening note—and now this "frighten[ing]" visit to a nearby elementary**
 17 **school mere days before the shooting—indicate he may have been planning to**
 18 **commit additional violent acts.**

19 As the United States argued in its detention motion, the KXTV/ABC 10 shooting was pre-
 20 planned and appeared to be part of a wider plot to conduct additional violent acts. The weekly planner
 21 entry on Hernandez Santana's refrigerator to "Do the Next Scary Thing" on Friday (i.e., the day of the
 22 shooting) suggests that the KXTV/ABC 10 shooting was only one step in a series of "scary thing[s]" he
 23 had planned. Additionally, the handwritten note that law enforcement found in Hernandez Santana's
 24 vehicle after the shooting—in which he claimed various federal officials are "next"—suggests that he
 25 had identified other potential targets in addition to the KXTV/ABC 10 station. Hernandez Santana's
 26 visit to that elementary school only three days before the shooting further reinforces the possibility that

27 ¹ Some were familiar with Hernandez Santana because his child had been enrolled there two
 28 years ago, at which time Hernandez Santana temporarily taught an after-school Spanish class. School
 staff and teachers at the elementary school had not seen Hernandez Santana on campus for a long time,
 however.

1 he had been considering or formulating plans of a violent attack against other targets in addition to the
2 KXTV/ABC 10 station.

3 The circumstances of Hernandez Santana's visit to that elementary school on September 16 are
4 both unusual and concerning. This behavior is consistent with pre-attack site surveillance, which is a
5 recognized indicator of an active shooter's planning and preparation activities.² He had not been to his
6 child's former elementary school for years, but he showed up unannounced just three days before the
7 shooting looking "very out of character" and demanded same-day access to "young students." This
8 behavior is all the more concerning because Hernandez Santana certainly knew the proper procedures to
9 follow in order to volunteer at the school—had that been his actual goal and not a pretext for gaining
10 access to campus—given his specific prior experience teaching after-school Spanish classes as well as
11 his general and professional experience of having gone to law school.

12 Hernandez Santana's actions on September 16 demonstrates—even more clearly—the danger he
13 poses if released. The Court should detain Hernandez Santana, as there is no condition, or combination
14 of conditions, that will reasonably assure his appearance and the safety of the community.

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16 Respectfully submitted,

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18 Dated: September 25, 2025

ERIC GRANT
United States Attorney

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20 By: /s/ ELLIOT WONG
21 ELLIOT WONG
Assistant United States Attorney
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26 ² See Silver, et al., A STUDY OF THE PRE-ATTACK BEHAVIORS OF ACTIVE SHOOTERS IN THE
27 UNITED STATES BETWEEN 2000 AND 2013, available at [https://www.fbi.gov/file-repository/pre-attack-](https://www.fbi.gov/file-repository/pre-attack-behaviors-of-active-shooters-in-us-2000-2013.pdf)
28 [behaviors-of-active-shooters-in-us-2000-2013.pdf](https://www.fbi.gov/file-repository/pre-attack-behaviors-of-active-shooters-in-us-2000-2013.pdf) (last visited Sept. 24, 2025) ("Pre-attack site
surveillance by an outsider may be one observable behavior in physical or online worlds indicative of
planning and preparation activities.").