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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	NO. CR20-70012-SK
)	
14 Plaintiff,)	GOVERNMENT’S MOTION TO DETAIN
)	
15 v.)	
)	Date: January 13, 2020
16 MUSTAPHA TRAORE,)	Time: 10:00 a.m.
a/k/a Olivier Adella,)	Judge: Hon. Sallie Kim
17 a/k/a Mustafa Traore,)	
a/k/a Scotte Traore,)	
18 a/k/a Moussa Mustapha,)	
)	
19 Defendant.)	
)	

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21 Defendant is an Ivory Coast national who entered the United States in 2002 under the name
22 “Olivier Adella” using a fake French passport. He has remained in the United States for almost two
23 decades under this alias. The name Olivier Adella, the birthdate July XX,¹ 1975, and the birthplace
24 Sarcelles, France on the fake French passport belong to an actual French citizen. Defendant used this
25 victim’s information to obtain U.S. immigration status and a U.S. passport.

26 On the night of April 28–29, 2016, the defendant took part in the murder of San Mateo resident
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¹ The exact date of birth has been redacted to protect personally identifiable information.

1 Keith Green. He admitted to police investigators that he put Green's body in his car, drove the body
2 across the Golden Gate Bridge, and dumped it a short distance off of Highway 101 in Sonoma County.
3 Defendant pleaded guilty to accessory to murder for his role in the crime; however, the sentencing judge
4 stated on the record that the defendant played a greater role in the murder than the charge to which he
5 pled guilty reveals.

6 The United States has translated a jail call in which the defendant, speaking in a West African
7 dialect, admits to being present at the time of Green's murder. Asked directly by the person he called in
8 Ivory Coast who killed Green, defendant demurred, saying "people might be listening to our
9 conversation [and] a Dioula speaker might be used to translate what we are saying." During the state
10 investigation of the murder, law enforcement had not been able to translate this jail call.

11 After the murder, the defendant made plans to flee the U.S., searching for flights to Germany and
12 France on his phone. About ten days after the murder, he married his second wife Uta Bredenstein (a
13 German citizen) and decided to adopt her surname as his own. Shortly thereafter, he submitted an
14 expedited U.S. Passport Renewal application listing his name as "Olivier Bredenstein" and stating that
15 he planned to travel to Germany and France. Before he could leave, however, police arrested him on
16 May 20, 2016.

17 Defendant's role in the murder of Keith Green, his history of violent and intimidating behavior
18 toward other people, and his decades-long use of fake identities and fraudulent identity documents
19 demonstrate that he is both a danger to the community and a serious flight risk. Because there are no
20 conditions that can reasonably assure the safety of the community and his appearance, he should be
21 detained.

22 **I. The Keith Green Murder Investigation**

23 **A. Defendant's Role in Green's Murder**

24 Defendant told investigators that on the night of the murder, he took Green's dead body from
25 Tiffany Li and Kaveh Bayat, removed all of Green's clothes, and put Green's body in the trunk of his
26 Chrysler 300. He also took Green's phone. He then drove north on Interstate 280 and, while passing
27 through Golden Gate Park, threw Green's phone out the window. About an hour north of San Francisco,
28 he pulled off the highway, drove a short distance down a dirt road, and dumped Green's body down an

1 embankment. Afterwards, he admitted that he used bleach inside the vehicle and in the trunk to
2 eliminate evidence of blood.

3 Defendant told state investigators that although Li and Bayat offered him money to kill Green, he
4 refused. He agreed to dispose of Green's body because he felt he owed Li and Bayat for previously
5 helping him and Uta Bredenstein financially. Asked by investigators whether Li and Bayat had offered
6 him a gun or a knife to kill Keith Green, defendant responded: "I don't need to, I break, I can break
7 people . . . with my hand. I don't need to use a gun" Defendant initially lied to state investigators
8 about contacting Green on a burner phone under a false name in the days before the murder; telling
9 Green that he was former professional football player; and suggesting that the two meet on the night of
10 the murder.

11 *B. Defendant Applied For a New Passport and Prepared to Leave the United States*

12 Following the murder on April 28–29, 2016, defendant made plans to flee the country. He
13 married his second wife Uta Bredenstein on May 9, 2016 and decided to adopt her surname as his own.
14 He sold the Chrysler 300 that he used to transport and dump Green's body. The body was found on
15 May 11, 2016 with a single gunshot wound through the neck. That same day, Uta Bredenstein and
16 defendant applied for an expedited U.S. passport for the couple's 1-year-old son Aksel. Around this
17 time, defendant also submitted an expedited U.S. Passport Renewal application listing his name as
18 "Olivier Bredenstein" and stating that he planned to travel to Germany and France. Defendant received
19 his new U.S. passport on May 18, 2016. That day, police announced that Green had been the victim of a
20 homicide after his body was identified through dental records. Defendant was arrested for Green's
21 murder on May 20, 2016. Police found \$35,500 in cash in a lunch box in the master bedroom closet.
22 The U.S. passport for defendant's son was issued on May 21, 2016.²

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26 ² Defendant told San Mateo law enforcement that he held an Ivory Coast passport as a teenager
27 when he was on Ivory Coast's national martial-arts team. Given uncertainty about the name in which
28 defendant's Ivory Coast passport was issued, defendant may be able to obtain an Ivory Coast passport,
including by mail, and attempt to flee the country. Defendant has a 2004 felony conviction for bail
jumping in New York.

1 C. Witness Tampering

2 Defendant entered into a cooperation agreement with state prosecutors in February 2018,
3 agreeing to testify against Li and Bayat in exchange for the state dropping murder charges against him.
4 The agreement required defendant not to use social media and not to contact anyone associated with the
5 defense of Li and Bayat.

6 Less than a month before the state murder trial began, defendant contacted Tiffany Valentine,
7 who was scheduled to testify as a witness for the defense. He contacted her on Instagram under the
8 username *laminetracy* and began the chat by writing: “Is Mustapha what’s good tiff.” Valentine told
9 state investigators that she dated defendant from 2003 to 2004 when they both lived in New York City
10 and that she knew him as Mustapha. After identifying himself, defendant wrote, “I heard that u been
11 talking with the Chinese girl people” and “u better mind ur business if I got into some shit too.” This
12 Instagram chat violated defendant’s plea agreement, and San Mateo law enforcement viewed it as an act
13 of witness tampering and intimidation. Defendant was removed from the state’s trial witness list and
14 remanded to custody.

15 The episode is significant with respect to the current federal charge because it shows that
16 defendant is willing to tamper with witnesses to prevent evidence of his true identity from coming to
17 light. When defendant was arrested, he insisted to agents that his name is not Mustapha Traore and that
18 they must be getting their information from his ex-wife and others who have conspired against him.

19 **II. Defendant’s Violent And Aggressive Behavior Toward Others**

20 A. Uta Bredenstein’s Former Landlord

21 Federal agents have interviewed Uta Bredenstein’s former landlord from the period of 2017-
22 2018 about an altercation with defendant. At the time, Bredenstein was living with another woman who
23 terminated her lease in 2018 because Bredenstein’s husband had moved in, and (she told the landlord)
24 she was very afraid of him. The housemate was so afraid of defendant that she abandoned her property
25 at the residence. Bredenstein moved out of the apartment but never paid the last month’s rent. The
26 landlord moved back into the property in November 2018.

27 In late November 2018, the landlord was awakened by defendant banging on the door.
28 Defendant asked about Bredenstein’s security deposit, which the landlord had withheld until repairs

1 could be made for damage to the apartment. The two men argued about the repair costs. When it
2 became clear that the landlord was not going to return the deposit then and there, defendant become very
3 aggressive and squared up in a fighting stance. The landlord repeatedly yelled at defendant to step back,
4 but was trapped between his locked apartment door and defendant.

5 The landlord told federal agents that it was hard for him to admit it as a former U.S. Marine, but
6 he feared for his life and believed the defendant was going to kill him. Defendant told him, "I have
7 fought in two civil wars in Africa, and I have killed people. I am crazy. My friends have killed people,
8 and they are crazy too." Defendant also told the landlord that he knew where he lived and where he
9 worked in Oakland. The landlord defused the situation by promising to give defendant the deposit back.
10 The landlord told investigators that shortly thereafter he took a new job because he no longer felt he
11 could leave home and go to work safely. Bredenstein eventually sued the landlord in small claims court.
12 Defendant became aggressive at the mediation and was asked to leave by the mediator.

13 In January 2019, the landlord told agents that he was driving on Interstate 80 near Emeryville
14 when he looked out his driver's side window and saw defendant staring at him from the passenger seat
15 of a silver Kia. Uta Bredenstein was driving. The landlord's description of the vehicle matches the
16 vehicle that agents have observed Bredenstein driving.

17 *B. Resisting Federal Arrest*

18 When agents attempted to take defendant into federal custody on January 10, 2020, he refused to
19 leave his jail cell. After agents showed him the federal arrest warrant, he began screaming that his name
20 is Olivier Adella, not Mustapha Traore. Defendant told the agents that they would have to kill him
21 before they could take him into custody. He later told the agents they would have to tase him in order to
22 remove him from the cell. At one point, six sheriff's deputies were in defendant's jail cell. He became
23 violent and aggressive, backing into a corner and squaring off with deputies. Defendant has worked at
24 mixed martial arts academies and has described himself as an MMA fighter. Sheriff's deputies
25 suggested bringing in an extraction team to remove defendant from his cell, but federal agents decided
26 they could not safely transport him in a vehicle without a secure holding cell. Defendant's state-
27 appointed lawyer was finally able to calm defendant.

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