

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

VS

PETER KARASEV

FILED

OCT 19 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIF.

CR 23 00364 BLF

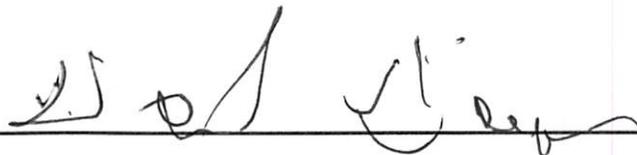
INDICTMENT

COUNT ONE: 18 U.S.C. § 1366(a) – Destruction of an Energy Facility

COUNT TWO: 18 U.S.C. § 1366(a) – Destruction of an Energy Facility

COUNT THREE: 18 U.S.C. § 844(h) – Use of Fire or an Explosive to Commit a Federal Felony

A true bill.



Foreperson

Filed in open court this 19 day of October A.D. 2023



United States Magistrate Judge

Bail. \$ NO bail arrest warrant

1 ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,

CR 23 00364 BLF
CASE NO.

12 Plaintiff,

VIOLATIONS:

13 v.

18 U.S.C. § 1366(a) – Destruction of an Energy Facility; 18 U.S.C. § 844(h) – Use of Fire or an Explosive to Commit a Federal Felony; and 18 U.S.C. §§ 844(c), 981(a)(1)(C), and 982(a)(2)(B) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

14 PETER KARASEV,

15 Defendant.

16
17 INDICTMENT

18 The Grand Jury charges:

19 COUNT ONE: (18 U.S.C. § 1366(a) – Destruction of an Energy Facility)

20 On or about December 8, 2022, in the Northern District of California, the defendant,

21 PETER KARASEV,

22 did knowingly and willfully damage the property of an energy facility, that is, a PG&E transformer,
23 located at or near 5361 Thornwood Drive in San Jose, California, and attempted to cause and caused a
24 significant interruption and impairment of a function of that energy facility, all in violation of Title 18,
25 United States Code, Section 1366(a).

26 COUNT TWO: (18 U.S.C. § 1366(a) – Destruction of an Energy Facility)

27 On or about January 5, 2023, in the Northern District of California, the defendant,

28
INDICTMENT

1 PETER KARASEV,

2 did knowingly and willfully damage the property of an energy facility, that is, a PG&E transformer,
3 located at or near 6105 Snell Avenue in San Jose, California, and attempted to cause and caused a
4 significant interruption and impairment of a function of that energy facility, all in violation of Title 18,
5 United States Code, Section 1366(a).

6 COUNT THREE: (18 U.S.C. § 844(h) – Use of Fire or an Explosive to Commit a Federal Felony)

7 On or about January 5, 2023, in the Northern District of California, the defendant,

8 PETER KARASEV,

9 knowingly used fire and an explosive to commit a felony which may be prosecuted in a court of the
10 United States, namely, the destruction of an energy facility in violation of Title 18, United States Code,
11 Section 1366(a), as charged in Count Two of this Indictment.

12 All in violation of Title 18, United States Code, Section 844(h).

13 FORFEITURE ALLEGATION: (18 U.S.C. §§ 844(c), 981(a)(1)(C), and 982(a)(2)(B) and 28
14 U.S.C. § 2461(c))

15 The allegations contained in this Indictment are re-alleged and incorporated by reference for the
16 purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 844(c), 981(a)(1)(C),
17 and 982(a)(2)(B), and Title 28, United States Code, Section 2461(c).

18 Upon conviction of the offenses set forth in Counts One and Two of this Indictment, the
19 defendant,

20 PETER KARASEV,

21 shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section
22 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which
23 constitutes or is derived from proceeds traceable to the offenses.

24 Upon conviction of the offense set forth in Count Three of this Indictment, the defendant,

25 PETER KARASEV,

26 shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section
27 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a
28 result of such violation(s), and pursuant to Title 18, United States Code, Section 844(c) and Title 28,

1 United States Code, Section 2461(c), any explosive materials involved or used or intended to be used in
2 the violation.

3 If any of the property described above, as a result of any act or omission of the defendant:

- 4 a. cannot be located upon exercise of due diligence;
- 5 b. has been transferred or sold to, or deposited with, a third party;
- 6 c. has been placed beyond the jurisdiction of the court;
- 7 d. has been substantially diminished in value; or
- 8 e. has been commingled with other property which cannot be divided without
9 difficulty,

10 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
11 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

12 All pursuant to Title 18, United States Code, Sections 844(c), 981(a)(1)(C), and 982(a)(2)(B),
13 Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

14
15 DATED: *October 19th, 2023*

A TRUE BILL.


FOREPERSON

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19 ISMAIL J. RAMSEY
United States Attorney

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22 ANDREW LIAO
Assistant United States Attorney
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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

Counts 1 & 2 - 18 U.S.C. § 1366(a) - Destruction of an Energy Facility Petty
 Minor
 Count 3 - 18 U.S.C. § 844(h) - Use of Fire or an Explosive to Commit a Federal Felony Misdemeanor
 Felony

PENALTY: Counts 1 and 2 - Maximum: 20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment.
 Count 3 - Minimum: 10 years custody consecutive to other sentence; Maximum: 20 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

PETER KARASEV

DISTRICT COURT NUMBER

CR 23

00364

FILED

OCT 19 2023

DEFENDANT

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE } SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant } MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under }

Name and Office of Person Furnishing Information on this form Ismail J. Ramsey

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Andrew Liao; Annie Hsieh

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST 03/01/23

Or... if Arresting Agency & Warrant were not
 DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: None

If Summons, complete following:
 Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CRIMINAL COVER SHEET

FILED
OCT 19 2023
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. PETER KARASEV

CASE NUMBER:

CR 23 CR 00364 BLF

Is This Case Under Seal?

Yes No

Total Number of Defendants:

1 2-7 8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes No

Venue (Per Crim. L.R. 18-1):

SF OAK SJ

Is this a potential high-cost case?

Yes No

Is any defendant charged with a death-penalty-eligible crime?

Yes No

Is this a RICO Act gang case?

Yes No

Assigned AUSA
(Lead Attorney): ANNE HSIEH

Date Submitted: October 19, 2023

Comments: