

UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED
May 17, 2022
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America
v.

Case No. 1:22-mj-00075-SAB

SARAH E. MEENAHAN
Defendant

CRIMINAL COMPLAINT

I, Officer Matthew Guglielmo, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2022 in the county of Tulare in the
Eastern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C. 113 (a)(3), 18 U.S.C. 13, CA VC 10851(a), and 36 C.F.R. 2.32(a)(2).

This criminal complaint is based on these facts:

(See Affidavit of U.S. Park Ranger Matthew Guglielmo, attached hereto and incorporated herein.)

[X] Continued on the attached sheet.

Matthew Guglielmo
Complainant's signature
United States Park Ranger Matthew Guglielmo, National
Park Service

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: May 17, 2022

City and state: Fresno, CA

Stanley A. Boone
Judge's signature
Stanley A. Boone, U.S. Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH E. MEENAHAN,

Defendant.

CASE NO.

AFFIDAVIT OF U.S. PARK RANGER MATTHEW
GUGLIELMO

1. I, Matthew Guglielmo, am a United States Park Ranger in Sequoia and Kings Canyon National Parks. I have been a Law Enforcement Officer with the National Park Service for four years. I have completed the Seasonal Park Ranger Training Academy at Northern Arizona University in Flagstaff, Arizona. During this course I received over 690 hours of Law Enforcement Training. I have a Bachelor's Degree in Natural Resource Management and Conservation.

2. I am providing this affidavit based upon my experience and training as a National Park Service Ranger in the State and Eastern District of California, my personal knowledge and observations, and information conveyed to me by others, including National Park Service Rangers.

3. Based on the facts set forth herein, I believe there is probable cause to believe that SARAH E. MEENAHAN committed a violation of Title 18, United States Code, Section 113(a)(3), assault with a dangerous weapon; Title 18m United States Code, Section 13(a) and California Vehicle Code, Section 10851, driving a vehicle without consent of the owner; and Code of Federal Regulations, Section 2.32(a)(2), failure to obey a lawful command.

4. On May 16, 2022 at approximately 0730 hours I was notified of an assault that took place at 0600 at the Wolverton Parking Area located within Sequoia National Park, which is in the special maritime and territorial jurisdiction of the United States. While discussing the report further with dispatch, they informed me that the reporting party (RP) was located at the Lodgepole Market pay phones where they called 911. The RP provided Sequoia Park Dispatch with a vehicle description of a

1 newer model white Lincoln with a California disabled plate. This information was broadcast to USPR
2 Cloutier, USPR Cueva and USPR Price responding from Ash Mountain and USPR Goff and USPR
3 Jones responding from Grant Grove. At approximately 0735 I arrived at the Lodgepole Market where
4 the RP was located. I identified the victims as T.S. and N. L., adult males. I asked T.S. to explain to
5 me what had happened. T.S. and N.L. arrived at the Wolverton Parking Area around 2000 or 2100 hours
6 the night before and parked their white Ford camper van near the back of the lot. Both observed a white
7 sedan parked nearby but did not see any occupants around the vehicle. N.L. set up camp 20 feet away
8 from the vehicle in the woods, while T.S. slept in the van. At 0200 hours, T.S. opened the side door of
9 the van for air flow.

10 5. T.S. stated that at approximately 0600 hours, a white female entered the open side door of
11 his Ford camper and mumbled something. The suspect then exited the van. Seconds later, the suspect re-
12 entered the van and quickly approached T.S. near the rear of the van. T.S. stated that the suspect raised
13 her arm holding a four inch knife with a serrated blade and attempted to stab him. T.S. was able to block
14 her and grabbed her wrist in an attempt to control the knife. T.S. pinned the suspect and yelled "Stop,
15 what are you doing?", to which she did not reply. The two physically struggled inside the van for one to
16 two minutes before T.S. was able to pull the suspect out the open door and began yelling for N.L.. T.S.
17 told the suspect to "walk away," to which the suspect replied "let me go and I'll leave." T.S. pushed the
18 suspect away and she turned around and walked to the white sedan across the lot and drove away.

19 6. T.S. and N.L. were able to take a picture of the vehicle as it drove away and provided a
20 California handicap plate "DG487." I asked to see the picture they had taken and could make out that it
21 was a white Chrysler sedan and not a Lincoln as previously reported. I could make out the blue handicap
22 symbol on the plate, but not other letters or numbers. I relayed to dispatch the updated vehicle
23 information and it was broadcast to all responding units.

24 7. T.S. described the suspect as in her mid 20's, approximately 5'5", 120 pounds, smaller
25 build with pale skin and shoulder length brown hair. She was reported to be wearing black leggings,
26 black jacket, black mask, black beanie, and a black backpack. The suspect description was relayed to
27 dispatch who broadcast it to all responding units.
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1 8. At 0807, park employee Benjamin Getz located a vehicle matching the description at the
2 Sequoia National Park sign near the park entrance in Ash Mountain. It was a white four door Chrysler
3 sedan with CA handicap plate DG847. Getz observed two people – a male and a female -- standing
4 between the Chrysler and a pickup truck. One was a white female (later identified as MEENAHAN)
5 with shoulder length dark hair, black mask, white sweater, black pants approximately 130 pounds. The
6 male was 6'01", 220 pounds and later identified as a NPS employee who was trying to assist
7 MEENAHAN with a flat tire. USPR Cueva instructed Getz to not approach the vehicle or
8 MEENAHAN. Getz continued observing MEENAHAN and at 0810 hours, the male NPS employee
9 shook MEENAHAN's hand and left in the pickup truck.

10 9. Getz then observed MEENAHAN walk towards a gold SUV parked in the parking lot
11 and attempted to open the driver's door but was unsuccessful. MEENAHAN then walked back the
12 Chrysler and got inside the vehicle. At 0814, USPR Cueva arrived at Sequoia Sign, exited his patrol
13 vehicle, and drew his pistol. USPR Cueva instructed MEENAHAN to exit the car over the vehicle PA.
14 MEENAHAN exited the car and USPR Cueva instructed her to turn around, put her hands up and step
15 away from the vehicle. MEENAHAN did not comply and USPR Cueva continued giving commands.
16 USPR Cloutier arrived on scene at 0815, exited his patrol car and drew his pistol. Both officers
17 continued to yell commands to MEENAHAN to get on the ground. MEENAHAN instead re-approached
18 the vehicle, leaned in and exited moments later with her left hand behind her back. MEENAHAN's left
19 hand remained behind her back for approximately 30 seconds before she brought it into view again.
20 MEENAHAN dropped to her knees at which time USPR Price arrived on scene. MEENAHAN then got
21 back up and began walking back to the vehicle. USPR Cloutier deployed his taser, achieving
22 neuromuscular incapacitation (NMI), and fell forward onto the ground. USPR Cueva and Price
23 approached MEENAHAN, gained control of her hands, and placed her in handcuffs. MEENAHAN was
24 placed into custody approximately 2 feet from the open driver's side door of the suspect vehicle.

25 10. USPR Cloutier and USPR Cueva documented and removed the taser probes from the
26 suspect per policy. The probes were inspected to ensure they were intact and placed in a sharps
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1 container along with the taser blast doors, Anti-Felon Identification Disks (AFID's), and cartridge. The
2 container was sealed and placed in evidence per policy (JAP001).

3 11. An inventory search of the suspect vehicle was conducted prior to being towed away
4 from the scene. During the search, a knife approximately 4 inches in blade length with a serrated blade,
5 was located in the driver's seat of the vehicle. Also located during the search was a black sweater, black
6 beanie, a black backpack and 2 California Identification cards that did not belong to MEENAHAN.

7 12. USPR Goff and USPR Jones received a written description of the suspect prior to a show
8 up and transported the two victims, T.S. and N.L., with their approval, to the arrest location.

9 13. USPR Goff and USPR Jones arrived on scene with T.S. and N.L.. MEENAHAN was
10 escorted to an area within view of the victims. Both victims confirmed identified MEENAHAN as the
11 person who assaulted T.S..

12 14. I received contact information for the registered owner (RO) of the Chrysler Sedan from
13 Sequoia dispatch. I contacted the RO by phone to see if she was aware of the location of her vehicle.
14 The RO stated that she had dropped her vehicle off at an auto shop in Hawthorne, CA on Wednesday
15 May 11, 2022. She had no idea that her vehicle was not at the shop and had not given anyone permission
16 to drive the vehicle. The shop owner denied giving anyone permission to drive the vehicle and
17 furthermore did not realize the vehicle was gone. The RO and the shop owner were instructed to contact
18 their local police department to file reports.

19 15. USPR Goff and USPR Cueva transported MEENAHAN to Community Regional
20 Medical Center for medical evaluation and clearance before booking her into Fresno County Jail.

21 **[Remainder of page intentionally left blank.]**
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1 16. Based on those facts and my training and experience, I concluded that MEENAHAN had
2 assaulted T.S. with a deadly weapon, with the intent to do bodily harm in violation of 18 U.S.C.
3 §113(a)(2); drove a vehicle without the owner's consent in violation of 18 U.S.C. § 13(a)(1) and
4 California Vehicle Code § 10851; and failed to obey a lawful command in violation of C.F.R. §
5 2.32(a)(2).
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10 *Complainant's signature*

11 United States Park Ranger Matthew Guglielmo,
12 National Park Service
13 *Printed name and title*

14 *Approved as to form*

15 /s/ Kimberly A. Sanchez
16 KIMBERLY A. SANCHEZ
17 Assistant U.S. Attorney
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