

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

**FILED**  
OCT 19 2023  
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 19<sup>th</sup>, 2023*

A TRUE BILL.

  
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FOREPERSON

19 ISMAIL J. RAMSEY  
20 United States Attorney

  
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22 ANDREW LIAO  
23 Assistant United States Attorney



AO 257 (Rev. 6/78)

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

BY: [ ] COMPLAINT [ ] INFORMATION [X] 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 [X] 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

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: SHOW DOCKET NO. [ ] U.S. ATTORNEY [ ] DEFENSE

[ ] 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

[X] 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) [X] On this charge
5) [ ] On another conviction } [ ] Federal [X] State
6) [X] 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 Month/Day/Year 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\* [X] 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: