DEFENDANT INFORMATION RELATIVE TO	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: COMPLAINT INFORMATION X INDICTMENT	Name of District Court, and/or Judge/Magistrate Location
OFFENSE CHARGED SUPERSEDIN	G NORTHERN DISTRICT OF CALIFORNIA
	OAKLAND DIVISION
18 U.S.C. § 844(f)(1) – Damage and Destruction of Property by Fire/Explosive (Institution Receiving Federal Financial	
Assistance); 18 U.S.C. § 844(i) – Damage and Destruction of Property by Fire/Explosive (Interstate Commerce); 26 U.S.C.	FILED
§ 5861(d) – Possession of Unregistered Firearm MISOE mean	or CASEY ROBERT GOONAN
X Felon	Jul 24 2024  DISTRICT COURT NUMBER Mark B. Busby
PENALTY: See attached	4:24-cr-00414 JSW  CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORN SAN FRANCISCO
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) If not detained give date any prior
Federal Bureau of Investigation	summons was served on above charges
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive
	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	
	IS IN CUSTODY
	4) X On this charge
this is a reprosecution of charges previously dismissed which were dismissed on motion SHOW	5)  On another conviction Federal  State
of: DOCKET NO.	.     6)  Awaiting trial on other charges
U.S. ATTORNEY DEFENSE	If answer to (6) is "Yes", show name of institution
this prosecution relates to a	Has detainer Yes 1 If "Yes"
pending case involving this same defendant MAGISTRATE	give date
CASE NO.	
prior proceedings or appearance(s)    X   before U.S. Magistrate regarding this	DATE OF Month/Day/Year ARREST
defendant were recorded under	Or if Arresting Agency & Warrant were not
Name and Office of Person Furnishing Information on this form ISMAIL J. RAMSEY	DATE TRANSFERRED Month/Day/Year TO U.S. CUSTODY
x U.S. Attorney ☐ Other U.S. Agency	
Name of Assistant U.S. Attorney (if assigned) Nikhil Bhagat	This report amends AO 257 previously submitted
ADDITIONAL INF	ORMATION OR COMMENTS —
PROCESS:	
☐ SUMMONS 🔀 NO PROCESS* ☐ WARRANT	Bail Amount:
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:	

#### **PENALTY SHEET**

#### United States v. Casey Robert Goonan

# Count 1: 18 U.S.C. § 844(f)(1) — Damage and Destruction of Property by Fire/Explosive (Institution Receiving Federal Financial Assistance)

- Imprisonment: Minimum 5 years up to 20 years
- Fine: Up to \$250,000
- Supervised Release: Up to 5 years
- Special Assessment: \$100
- RestitutionForfeiture

# Count 2: 18 U.S.C. § 844(i) — Damage and Destruction of Property by Fire/Explosive (Interstate Commerce)

- Imprisonment: Minimum 5 years up to 20 years
- Fine: Up to \$250,000
- Supervised Release: Up to 5 years
- Special Assessment: \$100
- Restitution
- Forfeiture

#### Count 3: 26 U.S.C. § 5861(d) – Possession of Unregistered Firearm

- Imprisonment: Up to 10 years
- Fine: Up to \$250,000
- Supervised Release: Up to 3 years
- Special Assessment: \$100
- Forfeiture

### United States District Court

# FOR THE NORTHERN DISTRICT OF CALIFORNIA

**VENUE: OAKLAND** 

**FILED** 

Jul 24 2024

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

4:24-cr-000414-JSW

V.

CASEY ROBERT GOONAN,

#### DEFENDANT(S).

### INDICTMENT

18 U.S.C. § 844(f)(1) – Damage and Destruction of Property by Fire/Explosive
(Institution Receiving Federal Financial Assistance)

18 U.S.C. § 844(i) – Damage and Destruction of Property by Fire/Explosive
(Interstate Commerce)

26 U.S.C. § 5861(d) – Possession of Unregistered Firearm

18 U.S.C. § 924(d)(1), 26 U.S.C. § 5872, 28 U.S.C. § 2461 – Forfeiture Allegations

A true bill.
/s/ Foreperson of the Grand Jury
Forema
Filed in open court this 23rd day of
July, 2024
Rose Maher- electronically signature
Two. J. Clerk
Bail, \$ No Process

Hon. Thomas S. Hixson, Magistrate Judge

1 ISMAIL J. RAMSEY (CABN 189820) **FILED** United States Attorney 2 3 Jul 24 2024 4 Mark B. Busby CLERK, U.S. DISTRICT COURT 5 NORTHERN DISTRICT OF CALIFORNIA 6 **SAN FRANCISCO** 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 OAKLAND DIVISION 11 CASE NO. 4:24-cr-00414 JSW UNITED STATES OF AMERICA, 12 Plaintiff, VIOLATIONS: 13 v. 18 U.S.C. § 844(f)(1) – Damage and Destruction of Property by Fire/Explosive (Institution Receiving 14 CASEY ROBERT GOONAN, Federal Financial Assistance) 15 Defendant. 18 U.S.C. § 844(i) – Damage and Destruction of 16 Property by Fire/Explosive (Interstate Commerce) 17 26 U.S.C. § 5861(d) – Possession of Unregistered Firearm 18 19 18 U.S.C. § 924(d)(1), 26 U.S.C. § 5872, 28 U.S.C. § 2461 – Forfeiture Allegations 20 OAKLAND VENUE 21 22 23 24 25 26 27 28

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INDICTMENT

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### The Grand Jury charges:

The Grand Jury charges:

#### **Introductory Allegations**

<u>INDICTMENT</u>

#### The University of California and the University of California Police Department

- 1. The University of California is a research university system that includes ten campuses across the State of California.
  - 2. The University of California is governed by the Regents of the University of California.
- 3. The Regents of the University of California receive billions of dollars in Federal financial assistance annually, including for program support, patient care, student financial aid, and research funding.
- 4. The University of California, Berkeley, located in Berkeley, California, in the Northern District of California, is a public university that is part of the University of California system.
- 5. In addition to managing public university campuses, the Regents of the University of California manages or co-manages three national laboratories on behalf of the United States Department of Energy, including the Lawrence Berkeley National Laboratory located in Berkeley, California.
- 6. The University of California Police Department (UCPD) is a California law enforcement agency.
- 7. A UCPD patrol vehicle is a "state or government facility" within the meaning of Title 18, United States Code, Section 2332f(e)(3).
- 8. Under California law, the UCPD has primary jurisdiction over campuses of the University of California and an area within one mile of the exterior boundaries of those campuses, and over "other grounds or properties owned, operated, controlled or administered by the Regents of the University of California."
- 9. UCPD Berkeley has primary responsibility for, among other things, the main Berkeley campus, as well as all University of California owned or controlled structures and properties within the Berkeley city limits and other adjacent jurisdictions, including the Lawrence Berkeley National Laboratory.
  - 10. UCPD Berkeley officers utilize marked patrol vehicles to, among other things, respond to

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calls for service and reports of criminal activity, act as a deterrent to crime, enforce state and local laws, provide support and assistance to the community, and respond to emergencies.

- 11. UCPD Berkeley officers also utilize marked patrol vehicles to protect commercial establishments on the University of California, Berkeley, campus, including convenience stores, dining establishments, and a hotel.
- 12. The University of California and the UCPD regularly conduct business in interstate and foreign commerce, for instance by purchasing goods and services in interstate and foreign commerce.

#### June 1, 2024 Damage and Destruction of UCPD Patrol Vehicle

- 13. UCPD Berkeley officers regularly park marked UCPD patrol vehicles on Barrows Lane near the intersection of Bancroft Way, adjacent to the UCPD Berkeley station.
- 14. On or about June 1, 2024, at approximately 5:04 a.m., the defendant, Casey Robert GOONAN, arrived in the area of the University of California, Berkeley campus carrying a reusable shopping bag containing six explosive devices commonly known as "Molotov cocktails."
- 15. GOONAN kicked the shopping bag underneath the fuel tank of a marked UCPD patrol vehicle and ignited the Molotov cocktails, as depicted below:



16. The patrol vehicle caught on fire, as depicted below:



- 17. UCPD officers received a report of the fire and were able to extinguish it.
- 18. In part due to the rapid response of UCPD officers, the patrol vehicle did not explode, but suffered significant damage to its rear seats, fuel port, and trunk.
- 19. The patrol vehicle, which was assembled in Michigan and necessarily traveled in interstate commerce to arrive in California, was deemed a total loss.
- <u>COUNT ONE</u>: (18 U.S.C. § 844(f)(1) Damage and Destruction by Fire/Explosive of Property Belonging to Institution Receiving Federal Financial Assistance)
  - 20. Paragraphs 1 through 19 are re-alleged and incorporated as if fully set forth herein.
  - 21. On or about June 1, 2024, in the Northern District of California, the defendant,

#### CASEY ROBERT GOONAN,

maliciously damaged and destroyed and attempted to damage and destroy, by means of fire and an explosive, a vehicle and other real and personal property in whole and in part owned and possessed by the Regents of the University of California, an institution and organization receiving Federal financial assistance, by means of fire and an explosive, in violation of Title 18, United States Code, Section 844(f)(1).

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1 2	COUNT TWO: (18 U.S.C. § 844(i) – Damage and Destruction by Fire/Explosive of Property Used in Interstate Commerce)	
3	22. Paragraphs 1 through 19 are re-alleged and incorporated as if fully set forth herein.	
4	23. On or about June 1, 2024, in the Northern District of California, the defendant,	
5	CASEY ROBERT GOONAN,	
6	maliciously damaged and destroyed and attempted to damage and destroy, by means of fire and an	
7	explosive, a vehicle and other real and personal property used in interstate and foreign commerce and i	
8	any activity affecting interstate and foreign commerce, in violation of Title 18, United States Code,	
9	Section 844(i).	
10	COUNT THREE: (26 U.S.C. § 5861(d) – Possession of Unregistered Firearm)	
11	24. Paragraphs 1 through 19 are re-alleged and incorporated as if fully set forth herein.	
12	25. On or about June 1, 2024, in the Northern District of California, the defendant,	
13	CASEY ROBERT GOONAN,	
14	knowingly possessed a firearm, to wit: a destructive device as defined in Title 26, United States Code,	
15	Section 5845(f), not registered to him in the National Firearms Registration and Transfer Record, all in	
16	violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.	
17	FORFEITURE ALLEGATIONS: (18 U.S.C. § 924(d)(1), 26 U.S.C. § 5872, and 28 U.S.C. § 2461)	
18	26. The allegations contained in this Indictment are re-alleged and incorporated by reference	
19	for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 924(d), Title 28	
20	United States Code, Section 2461, and Title 26, United States Code, Section 5872.	
21	27. Upon conviction of the offenses alleged in Counts One through Three above, the	
22	defendant,	
23	CASEY ROBERT GOONAN,	
24	shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461, any firearms	
25	or ammunition involved in the commission of the said violations.	
26	28. Upon conviction of the offense alleged in Count Three above, the defendant,	
27	CASEY ROBERT GOONAN,	
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INDICTMENT 5

shall forfeit to the United States, pursuant to 26 U.S.C. § 5872, any firearm involved in or used in any violation of Title 26, Chapter 56. 2 All pursuant to Title 18, United States Code, Sections 924(d)(1), Title 28, United States Code, 3 4 Section 2461, and Federal Rule of Criminal Procedure 32.2. 5 DATED: July 23, 2024 A TRUE BILL. 6 /s/ Foreperson 7 FOREPERSON OF THE GRAND JURY 8 San Francisco ISMAIL J. RAMSEY United States Attorney 10 11 NIKHIL BHAGAT Assistant United States Attorney 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

INDICTMENT