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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SON THANH NGUYEN

Defendant.

Case No. **24-mj-03215**

COMPLAINT FOR VIOLATION OF

Title 18, U.S.C., Sec. 844(i) -
Use of an Explosive to Damage
Property

The undersigned complainant being duly sworn states:

Count 1

On or about June 8, 2024, within the Southern District of California, defendant SON THANH NGUYEN did maliciously damage and destroy, by means of an explosive, a building and other real and personal property used in interstate and foreign commerce and in activities affecting interstate and foreign commerce, to wit: and ATM machine on the premises of California Coast Credit Union, located at 3284 Governor Drive, San Diego, CA 92122; in violation of Title 18, United States Code, Section 844(i).

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Count 2

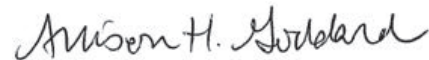
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2 On or about June 28, 2024, within the Southern District of
3 California, defendant SON THANH NGUYEN did maliciously damage and
4 destroy, by means of an explosive, a building and other real and personal
5 property used in interstate and foreign commerce and in activities
6 affecting interstate and foreign commerce, to wit: and ATM machine on
7 the premises of First Citizen's Bank, located at 16536 Bernardo Center
8 Drive, San Diego, CA 92128; in violation of Title 18, United States
9 Code, Section 844(i).

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Alex Esconde
14 Federal Bureau of Investigation

15 Attested to by the applicant in accordance with the requirements of Fed.
16 R. Crim. P. 4.1 by telephone on this this 23rd day of August, 2024.

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ALLISON H. GODDARD
20 UNITED STATES MAGISTRATE JUDGE

STATEMENT OF FACTS

California Coast Credit Union ATM Bombing - June 8, 2024

On June 8, 2024, at approximately 3:24 AM, Son Thanh NGUYEN, damaged and burglarized an ATM machine by means of an explosion, which was located on the premises of California Coast Credit Union ("CCCU"), located at 3284 Governor Drive, San Diego, CA 92122 (hereinafter, the "CCCU ATM bombing"). At the time of the bombing, all CCCU's deposits were insured by the National Credit Union Administration ("NCUA").

Through video surveillance recordings, Investigators saw that at 3:24 AM, NGUYEN arrived at the CCCU in a black colored sedan (later determined to be a Volvo) with aluminum rims, wearing a dark colored t-shirt, and brown/green colored beanie and balaclava. Upon arrival, NGUYEN exited the driver's side of the vehicle on foot carrying unknown tools/devices. NGUYEN then appeared to make multiple attempts, using the tools, to pry the cash dispense door open.

At approximately 3:26 AM, NGUYEN brought a blue plastic container (approximately 5 gallons in size) with white spout, from the area of NGUYEN's vehicle, to the area in front of the CCCU ATM. NGUYEN then appeared to insert a black polyvinyl chloride plastic ("PVC") hose, with wires attached, into the CCCU ATM machine.



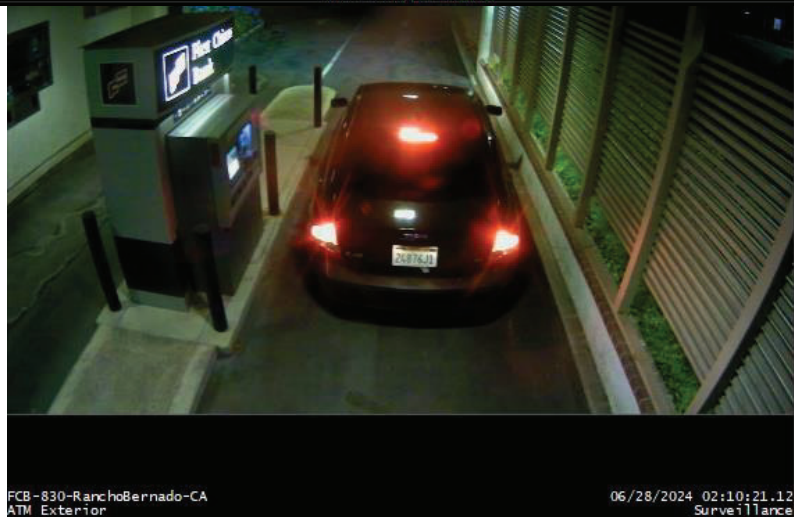
1 A short time afterwards, a small explosion occurred inside of the
2 CCCU ATM. At approximately 3:27 AM, NGUYEN returned to the CCCU ATM,
3 and appeared to manipulate the CCCU ATM. Nguyen did not gain access to
4 the CCCU ATM, and left the scene of the attempted bombing in the vehicle.
5 At approximately 3:36 AM, the San Diego Police Department ("SDPD")
6 received a call from Alarm Unlimited, which is the alarm company for
7 CCCU. The company reported that the CCCU ATM had been tampered with.
8 At the same time, SDPD, received a report of possible gunshots at an
9 address near the CCCU ATM.

10 At approximately 3:40 AM, SDPD officers arrived on scene at the
11 CCCU ATM. They observed a white PVC pipe connected to a black PVC pipe
12 with two batteries taped to it. They also observed pieces of what looked
13 like a blue balloon around the ATM. Approximately 20 feet from the CCCU
14 ATM was another plastic pipe.

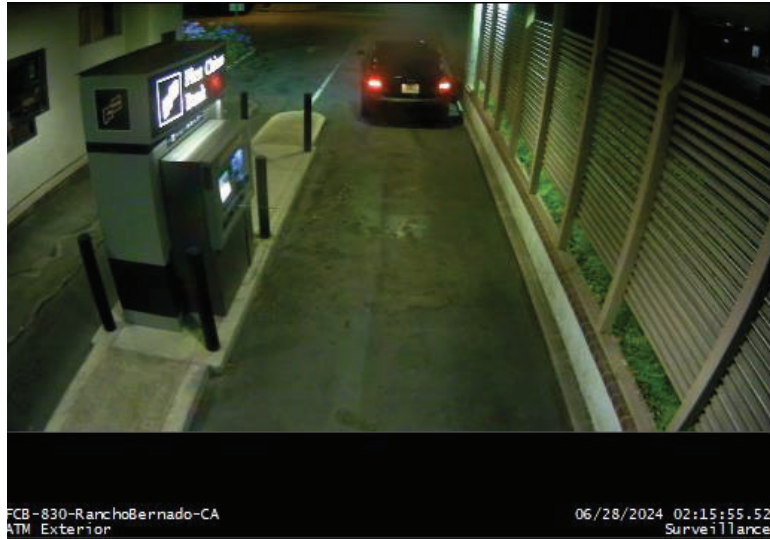
15 *First Citizen's Bank ATM Bombing - June 28, 2024*

16 On June 28, 2024 at approximately 2:10 AM, NGUYEN again damaged and
17 burglarized an ATM machine by means of an explosion. This time, the ATM
18 was located on the premises of First Citizen's Bank ("FCB"), located at
19 16536 Bernardo Center Drive, San Diego, CA 92128 (hereinafter, the "FCB
20 ATM bombing"). NGUYEN arrived in a black Volvo S40 sedan and parked in
21 the drive through ATM lane. Nguyen wore a long sleeve top and similar
22 beanie and balaclava worn in the CCCU bombing. NGUYEN then removed
23 tools from the rear passenger area of his vehicle and appeared to use
24 the tools to manipulate the FCB ATM cash dispenser area. At one point
25 NGUYEN again reached into the back seat of the vehicle through the open
26 rear driver's side door and removed another tool/device that appeared
27 to have a valve attached to the top. At approximately 2:11 AM, NGUYEN
28 pulled the vehicle forward and continued to use tools to pry open the

1 FCB ATM door. At approximately 2:12 AM, NGUYEN got into the driver's
2 seat of the vehicle, drove away from the FCB ATM, and exited the FCB
3 parking lot. At approximately 2:13 AM, NGUYEN returned to the FCB parking
4 lot and pulled back into the FCB ATM drive through. NGUYEN removed a
5 metal u-shaped rod from the rear passenger seat of the vehicle and then
6 manipulated the device into the FCB ATM's cash dispensary slot. NGUYEN
7 then removed the tool/device and appeared to put it into the rear seat
8 of the vehicle. NGUYEN then removed a separate tool/device from the
9 vehicle, knelt in front of the FCB ATM, and pushed the device into the
10 FCB ATM. The tool/device appeared to have wires attached.



1 At approximately 2:15 AM, NGUYEN got back into the vehicle and
2 pulled the vehicle away from the FCB ATM with the tool/device still
3 wedged into the FCB ATM, and the wires attached to the tool and extending
4 into the driver's seat area of the vehicle.



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14 Between 2:15:30 AM and 2:15:46 AM, the attached camera on the FCB
15 ATM suddenly jolted. Upon review, NGUYEN appeared to pull on the wires
16 that were attached to the tool/device wedged into the FCB ATM. NGUYEN
17 then exited the driver's door of the vehicle and manipulated the
18 tool/device still wedged into the FCB ATM.

19 At approximately 2:15:53 AM, NGUYEN's vehicle pulled away from the
20 FCB ATM with the tool/device still wedged into the FCB ATM, and the
21 wires still attached.

1 From approximately 2:16 AM through 2:51 AM, smoke emitted from the
2 FCB ATM.

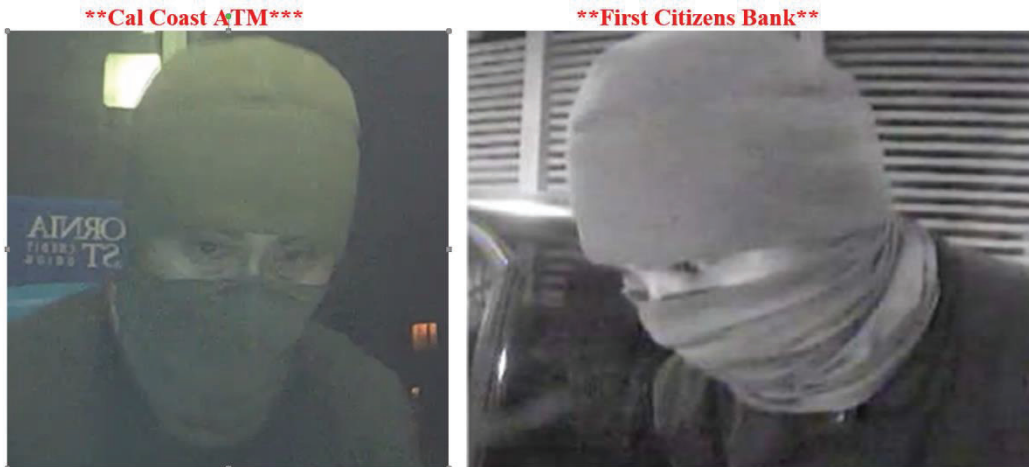


12 At approximately 3:23 AM, SDPD received a call to investigate a
13 burglary alarm at the FCB ATM. Upon arrival, officers observed the FCB
14 ATM with smoke coming out of it and electrical components on fire.
15 Electrical wires protruded from the machine with a metal rod bent into
16 a U-shape attached. Additionally, blue material with a white and black
17 valve was found in front of the ATM.



Facial Identification of NGUYEN

Based on a review of the surveillance videos from both the CCCU and FCB ATM burglaries, the perpetrator had visible facial features that were very similar, such as the bridge-area near the nose, and the eyes. Additionally, the subject appeared to be wearing the same knit cap and facial covering. The subject's stature and mannerisms were also very similar. As explained further below, further investigation identified the vehicle NGUYEN likely used in both burglaries, which, through the actual registration, revealed NGUYEN's driver's license identification photograph. NGUYEN's facial features are very similar to the ones described above.



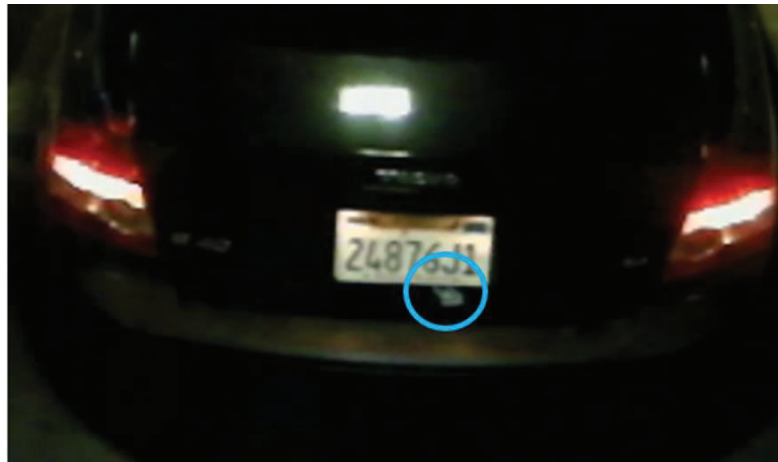
Identification of NGUYEN'S Vehicle

Through FCB's surveillance footage, the license plate was clearly visible on the vehicle NGUYEN used, which showed a California plate 24876J1. Also clear from that footage was that the vehicle was a Volvo sedan. Although the type of vehicle, and license plate was not clearly identifiable through the CCCU ATM bombing surveillance footage, it was

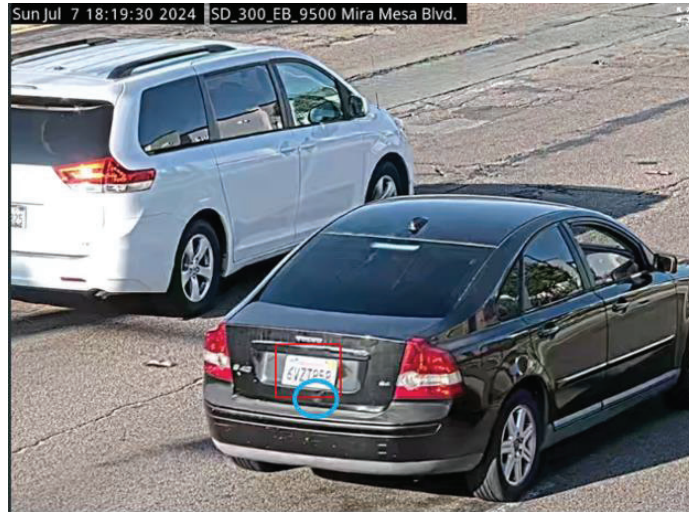
1 clear that the vehicle used in that bombing was a sedan, similar to a
2 Volvo, and that the vehicles used in both burglaries seemed identical.

3 A query of the California Department of Motor Vehicles ("DMV")
4 database revealed that California license plate 24876J1 was registered
5 as a 2013 Ford van, and that the registered owner was Mouanne's
6 Distributors West, 6101 Rickenbacker Road, Commerce, CA 90040. Based
7 on this discrepancy, investigators believed at that time, and still
8 believe, that the license plate affixed to NGUYEN's vehicle during the
9 FCB ATM bombing was used temporarily to avoid law enforcement detection.

10 A closer examination of NGUYEN's vehicle from FCB surveillance
11 video, revealed minor damage or some sort of anomaly apparent on the
12 trunk area of the vehicle just below the license plate as shown here:

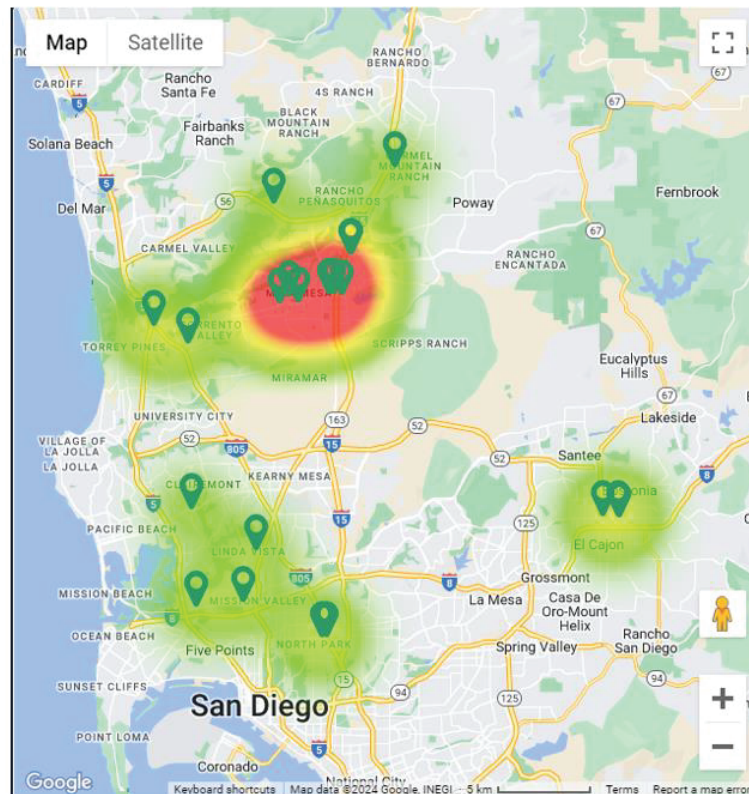


21 Using the known information that the suspect-vehicle was a black
22 Volvo, investigators conducted a query of the California License Plate
23 Reader ("LPR") database was conducted. Through that search,
24 investigators found a Volvo S40 sedan, bearing California license plate
25 6VZT858 (hereinafter, the "LPR Volvo") that had visible characteristics
26 similar to the vehicle used in the burglaries, and that the LPR Volvo
27 which included a similar anomaly to the trunk under the license plate,
28 similar rims, and similar vehicle tint.



9 The LPR database also revealed that the LPR Volvo had a heavy presence
10 in the areas of the CCCU and FCB ATM burglaries on the dates in
11 question.

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15 Last 30 days CA 6VZT858:



Continued Facial Identification of NGUYEN

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2 A query of the DMV database using the LPR Volvo license plate
3 information revealed that it was registered to NGUYEN, residing at 7413
4 Canyon Breeze Drive, San Diego, CA. A query of other law enforcement
5 databases revealed NGUYEN resided at 7413 Canyon Breeze Drive, San Diego,
6 CA.

7 A comparison of NGUYEN's facial features from his California
8 Driver's License photograph to still photographs taken from the CCCU
9 and FCB burglaries revealed several similarities including the eye
10 shapes, nose bridge, and presence of malar bags (under eye bags).

****Cal Coast ATM****



****NGUYEN DMV Photo****



1 On July 25, 2024, a physical surveillance was conducted at 7413
2 Canyon Breeze Drive, San Diego, CA. During the surveillance, the LPR
3 Volvo was observed parked in front of the residence.



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13 Another comparison was done using the comparing the photograph of
14 the LPR Volvo taken in front of 7413 Canyon Breeze Drive, San Diego,
15 CA and the images from the FCB surveillance video, which revealed they
16 were the identical make and model vehicle, as well as similar (if not
17 identical) rims, tinted windows, and damage to the trunk. See below on
18 next page.

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On August 23, 2024, federal search warrants authorizing searches of NGUYEN's residence, as well as the LPR Volvo, were executed. Investigators found the following in NGUYEN's residence: a u-shaped rod, a metal plate welded onto a pole, a balaclava, and a beanie. Investigators also found gas, black powder, potassium nitrate sulfur, explosive pre-cursor chemicals, a paper that explains how to make black powder and a firearm in NGUYEN'S residence. Investigators found the

1 following in NGUYEN'S car: a black hose, neck gaiter and California
2 license plate bearing number 24876J1. All of this equipment and clothing
3 is consistent with what was used during the ATM bombings and burglaries.

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