

DMP:FJN
F.#2020R00621

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JEREMY TRAPP,

Defendant.

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COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF APPLICATION FOR
ARREST WARRANT

(18 U.S.C. § 33)

No. 20-M-626

EASTERN DISTRICT OF NEW YORK, SS:

DAVID J. WILLIAMS, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about July 17, 2020, within the Eastern District of New York and elsewhere, the defendant JEREMY TRAPP did willfully, with the intent to endanger the safety of any person on board and anyone whom he believed would board, and with a reckless disregard for the safety of human life, damage, disable, destroy, tamper with, and attempt to damage, disable, destroy, and tamper with a motor vehicle that was used, operated, and employed in interstate and foreign commerce, to wit: a New York City Police Department vehicle in Brooklyn, New York.

(Title 18, United States Code, Section 33)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Joint Terrorism Task Force ("JTTF"). I have been a Special Agent for approximately three years. As a Special Agent, I have investigated numerous matters during the course of which I have conducted physical and electronic surveillance, interviewed witnesses, executed court-authorized search warrants and used other investigative techniques to secure relevant information regarding a variety of crimes. I am familiar with the facts and circumstances set forth below from my personal review of records, documents and other physical evidence obtained during this investigation, and from communications and information provided to me by fellow agents and other government personnel with knowledge related to this investigation.

2. Beginning in late May 2020, thousands of people held large demonstrations in Brooklyn, New York to protest the death of George Floyd, an African-American man who died during an arrest by Minneapolis, Minnesota police officers. During the demonstrations, certain individuals and groups of individuals unlawfully obstructed the flow of vehicle traffic on city streets and refused lawful commands from New York City Police Department ("NYPD") officers. Some individuals and groups of individuals vandalized vehicles and businesses with graffiti and by smashing the vehicles and windows of the businesses with heavy objects. Some individuals and groups of individuals

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

targeted the NYPD, assaulting officers, vandalizing NYPD vehicles that had responded to the protests, and in some cases, attempting to gain access to NYPD stationhouses without authorization, thus interfering with and obstructing the NYPD's efforts to maintain and restore order.

3. On or about July 11 and 12, 2020, demonstrators proclaiming to be pro-law enforcement gathered in Dyker Heights and Bay Ridge, Brooklyn to express support for law enforcement in light of the George Floyd demonstrations. Other individuals confronted the proclaimed pro-law enforcement demonstrators, leading to violent clashes between some members of the two groups. These clashes resulted in injuries and multiple arrests by NYPD officers.

4. On or about July 13, 2020, a group of demonstrators gathered outside the Brooklyn Criminal Court building in downtown Brooklyn, New York. The demonstrators were shouting at police officers and objecting to the arrests of individuals who had confronted the pro-law enforcement demonstrators in Bay Ridge, Brooklyn. As the demonstration was winding down, an individual later identified as JEREMY TRAPP ("TRAPP") spoke with an individual who was a confidential source for the NYPD (the "CS").²

5. During the conversation, TRAPP stated that the police were racist, that he wanted to harm police officers and their supporters, and that he had previously been involved in destroying property and burning a police car. TRAPP also stated that he wanted

² The CS is a paid informant for the NYPD. The information provided by the CS has proven reliable in the past and has been corroborated by independent investigative techniques.

to cut the brake lines on police cars. TRAPP and the CS exchanged telephone numbers so that they could contact each other in the future.

6. Over the ensuing days, TRAPP and the CS communicated via telephone calls and text messages, and arranged to meet. On or about the night of July 15, 2020, the CS picked up TRAPP at TRAPP's home in Brooklyn, New York. TRAPP and the CS talked as they drove around Brooklyn in the CS's vehicle during the evening of July 15, 2020 and into the early morning hours of July 16, 2020. The CS recorded a portion of this conversation. TRAPP told the CS that he wanted to "burn the [Verrazzano-Narrows] bridge down" so that "white supremacists" could not use it to get to Brooklyn from Staten Island. TRAPP also told the CS that he wanted to conduct reconnaissance of the Verrazzano-Narrows Bridge.

7. TRAPP reiterated to the CS that he wanted to harm police officers. Specifically, TRAPP stated that the way to deal with police cars was to "cut their brakes off." TRAPP questioned the point of burning police cars because the end result was only a burned car, but encouraged the CS that they needed to burn down NYPD precincts instead. TRAPP and the CS agreed to meet later that day to take pictures of the Verrazzano-Narrows Bridge.

8. Later in the day on or about July 16, 2020, the CS and TRAPP drove to the Brooklyn side of the Verrazzano-Narrows Bridge in the CS's vehicle, and TRAPP took photographs of the bridge.

9. TRAPP then suggested that he and the CS drive around Brooklyn to look for police cars so that TRAPP could cut their brake lines. While driving, TRAPP and the CS saw various police cars but did not see any unattended ones, and ceased their search. When the CS later dropped TRAPP off at TRAPP's home in Brooklyn, they discussed

meeting at a demonstration scheduled for the next day in Bay Ridge, Brooklyn. TRAPP told the CS that the demonstrations were too non-violent and were not accomplishing anything. TRAPP told CS that he wanted to cut the brake lines on police cars instead of going to the demonstration.

10. On or about July 17, 2020, TRAPP and the CS communicated via telephone calls and text messages. The CS again drove to TRAPP's home in Brooklyn and picked him up in the CS's vehicle. NYPD officers established surveillance of TRAPP and the CS in advance of the meeting. While in the CS's vehicle, TRAPP showed the CS his backpack, which contained, among other things, a scissor-like tool that could be used to sever a vehicle's brake lines.

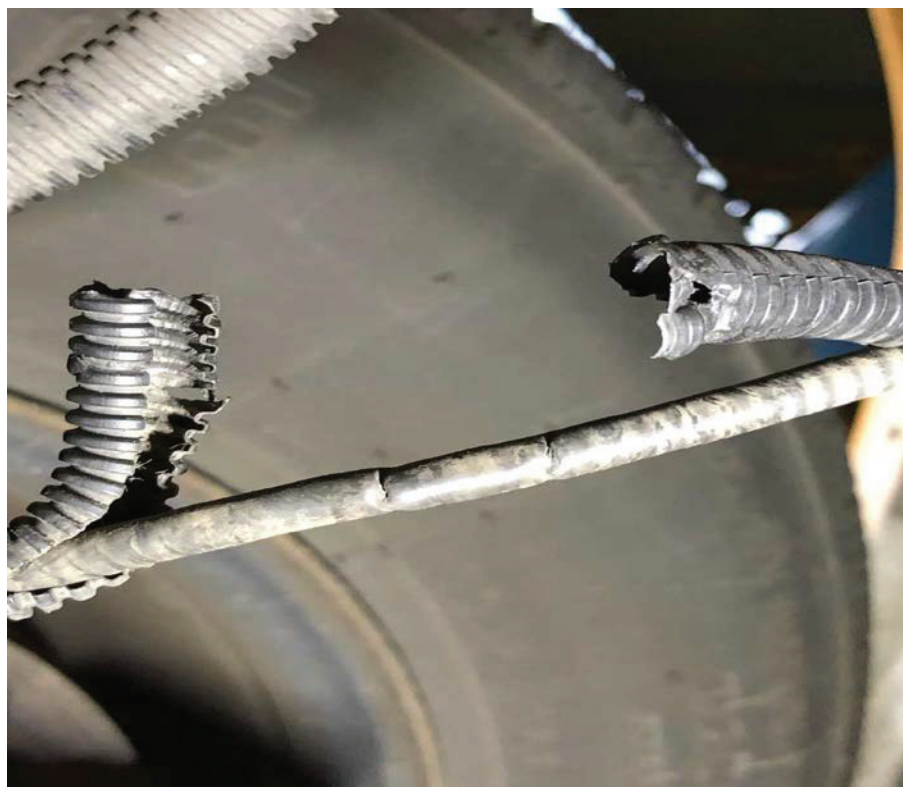
11. At approximately 4:00 p.m. on July 17, 2020, TRAPP and the CS approached a marked NYPD 2014 Chevrolet Express Van (the "NYPD Van") that was parked near 4th Avenue and 42nd Street in Brooklyn. The NYPD Van was marked "NYPD" and "POLICE" in multiple areas, and bore visible police lights. TRAPP crawled under the NYPD Van and reached for something near one of the vehicle's wheel wells. The CS stood nearby acting as a purported "lookout." TRAPP then crawled out from under the NYPD Van and left the area with the CS. Both the CS and the NYPD officers conducting surveillance captured this incident on video. An image of TRAPP under the NYPD Van is shown below.



12. TRAPP and the CS then got into the CS's vehicle, and the CS drove away from the NYPD Van. The NYPD officers that had been surveilling TRAPP and the CS followed in covert pursuit. TRAPP expressed excitement to the CS about having severed the brake line on the NYPD Van and stated that he wanted to do the same to more police cars. TRAPP and the CS drove around Brooklyn looking for other police vehicles to sabotage, and eventually drove to an encampment of protestors located near City Hall in Manhattan. TRAPP and the CS walked around the encampment, returned to the CS's vehicle, and drove back to Brooklyn. The same NYPD officers kept TRAPP under constant surveillance during this entire time, and arrested TRAPP shortly thereafter TRAPP and the CS returned to Brooklyn.

13. At the time of his arrest, TRAPP was wearing the same clothes he was wearing when he crawled under the NYPD Van. A search incident to arrest of TRAPP revealed a scissor-like tool in TRAPP's possession.

14. The NYPD transported the NYPD Van to a nearby facility for inspection shortly after TRAPP emerged from under the vehicle. An inspection of the NYPD Van revealed that a line for a wheel speed sensor had been partially severed. An NYPD automobile mechanic has informed the FBI that the partially severed line is part of the NYPD Van's anti-lock braking system. A malfunctioning anti-lock braking system would adversely impact a driver's ability to stop and maintain control of the NYPD Van in an emergency. The NYPD mechanic also informed the FBI that the wheel speed sensor line looks similar to the NYPD Van's brake line and that it is located in the same area of the NYPD Van. If the brake line had been severed in the same manner as the wheel speed sensor line, the driver of the NYPD Van would have been unable to use the vehicle's brakes. An image of the damage to the NYPD Van is shown below.



15. The NYPD Van is the property of the NYPD and the New York City government. Both the NYPD and New York City government conduct business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the NYPD and the New York City government in enacting and enforcing laws also affect interstate commerce. The NYPD and the New York City government are also the recipients of financial assistance from the federal government, including grants from the U.S. Department of Homeland Security.

WHEREFORE, your deponent respectfully requests that the defendant JEREMY TRAPP be dealt with according to law.

David Williams by SMG w/permission by phone 8/4/20

DAVID J. WILLIAMS

Special Agent, Federal Bureau of Investigation

Sworn to before me by telephone this
4th day of August, 2020

Steven M. Gold

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK