

ATTACHMENT A

COUNT ONE

(Attempt to Damage Government Property by Fire)

On or about May 31, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JUSTIN D. SPRY,

did knowingly, intentionally, and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a vehicle, and other real and personal property, which was owned and possessed by an institution or organization receiving Federal financial assistance, namely, a Trenton Police Department vehicle bearing New Jersey license plate number MG68426.

In violation of Title 18, United States Code, Sections 844(f)(1) and 2.

COUNT TWO
(Attempt to Damage Property in Commerce by Fire)

On or about May 31, 2020, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JUSTIN D. SPRY,

did knowingly, intentionally, and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, a vehicle, and other real and personal property, which was used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, namely, a Trenton Police Department vehicle bearing New Jersey license plate number MG68426.

In violation of Title 18, United States Code, Sections 844(i) and 2.

ATTACHMENT B

I, Michael Hooper, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with witnesses and other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about May 25, 2020, George Floyd died while in the custody of the Minneapolis, Minnesota, Police Department. The circumstances surrounding Floyd's death drew national media attention. In the days following Floyd's death, large-scale protests were held throughout the United States.

2. One such protest took place on or about Sunday, May 31, 2020, in and around Trenton, New Jersey. While the protest earlier in the day was peaceful, violence erupted later. Among other things, a group of individuals proceeded down East State Street in Trenton and began to riot, smashing store fronts, looting stores, and attacking multiple marked Trenton Police Department vehicles parked on the 100 Block of East State Street.

3. At or around 8:20 p.m., a City of Trenton street camera captured one of the rioters as he began stuffing what appeared to be a piece of cloth into the gas tank of one of the police vehicles, a Trenton Police vehicle bearing New Jersey license plate number MG68426 (the "Vehicle"). The rioter attempted to ignite the cloth unsuccessfully, at which point the defendant, JUSTIN D. SPRY, who also was captured by the street camera video, approached to assist. The street camera footage showed defendant SPRY, using an unidentified means of ignition, attempt to ignite the cloth and other objects while inserting them into the Vehicle's gas tank. Law enforcement officers on scene observed SPRY as he attempted to ignite the Vehicle. SPRY noticed the officers and attempted to flee. SPRY resisted arrest, but was subdued by the officers and placed under arrest.

4. At all times relevant to this criminal complaint, including on or about May 31, 2020, the City of Trenton and the Trenton Police Department owned and possessed the Vehicle. At all times relevant to this criminal complaint, the City of Trenton and the Trenton Police Department were entities receiving financial assistance from the Federal Government of the United States.

5. The City of Trenton and the Trenton Police Department conduct business in interstate commerce by, among other means, purchasing goods in interstate commerce, including vehicles. The City of Trenton and the Trenton Police Department also engage in activities affecting interstate commerce,

including the administration and enforcement of laws. The Vehicle was used in the City of Trenton and Trenton Police Department's law enforcement and other activities in and affecting interstate commerce.