
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Tonianne J. Bongiovanni
 : :
 : :
 : Mag. No. 20-3019 (TJB)
 : :
EARLJA J. DUDLEY : **CRIMINAL COMPLAINT**

I, Michael Hooper, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

s/Michael Hooper

Michael Hooper, Special Agent
Federal Bureau of Investigation

Attested to me by telephone pursuant to FRCP 4.1(b)(2)(A),
June 16, 2020, in the District of New Jersey

HONORABLE TONIANNE J. BONGIOVANNI
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

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,

EARLJA J. DUDLEY,

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 C55-KVY.

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,

EARLJA J. DUDLEY,

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 C55-KVY

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. On the evening of May 31, 2020, a video taken by a bystander captured one of the rioters, later identified as the defendant, EARLJA J. DUDLEY, as he and an unidentified male ("UM 1") opened the hood of a Trenton Police Department vehicle bearing New Jersey license plate number C55-KVY (the "TPD Vehicle"). DUDLEY was then joined by another unidentified male ("UM 2"). UM 2 stood by the opened hood of the TPD Vehicle and ignited an object that DUDLEY was holding. DUDLEY then placed the flaming object into the engine well of the TPD Vehicle. In the bystander video, DUDLEY was wearing a black tank top prominently featuring the roman numerals "XIV" in red (the "XIV Tank Top"). DUDLEY also was wearing a backwards black baseball cap bearing the roman numerals "XIV" in red (the "XIV Cap"). In the bystander video, DUDLEY also was wearing distinctive green, black, and white sneakers (the "Sneakers").

4. A law enforcement officer from the intelligence unit of the Trenton Police Department viewed the bystander video and, based on her personal knowledge and experience, identified DUDLEY as the individual captured in the bystander video who placed the ignited object into the engine well of the TPD Vehicle on May 31, 2020, as described above.

5. Thereafter, law enforcement conducted physical surveillance of DUDLEY at and around his residence in Trenton. Based on that surveillance, law enforcement confirmed that DUDLEY was the same individual captured in

the bystander video who attempted to light the TPD Vehicle on fire on May 31, 2020, as described above.

6. During the investigation, law enforcement identified publicly posted photographs on multiple social media accounts, which showed DUDLEY wearing, in one instance, both the XIV Tank Top and the XIV Cap, and in other instances, the Sneakers.

7. 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 TPD 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.

8. 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 TPD Vehicle was used in the City of Trenton and Trenton Police Department's law enforcement and other activities in and affecting interstate commerce.