

Approved: T. Josiah Pertz  
T. Josiah Pertz  
Assistant United States Attorney

Before: THE HONORABLE JAMES L. COTT  
United States Magistrate Judge  
Southern District of New York

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	:
UNITED STATES OF AMERICA	:
	:
- v. -	:
	:
VICTOR A. SANCHEZ-SANTA,	:
	:
Defendant.	:
	:
- - - - -	X

SEALED COMPLAINT

Violations of 18  
U.S.C. §§ 844(f) and  
2.

COUNTY OF OFFENSE:  
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

EDWARD SIMONETTI, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

COUNT ONE  
(Arson)

1. On or about June 9, 2020, in the Southern District of New York and elsewhere, VICTOR A. SANCHEZ-SANTA, the defendant, maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire and an explosive, a vehicle, in whole and in part owned and possessed by an institution and organization receiving Federal financial assistance, to wit, SANCHEZ-SANTA lit a cloth glove on fire and tossed it under an NYPD-owned vehicle in New York, New York.

(Title 18, United States Code, Sections 844(f) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Detective with the NYPD. I have been personally involved in the investigation of this matter, and I

base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my review of video recordings, I have learned that movements and actions of an individual later identified as VICTOR A. SANCHEZ-SANTA, the defendant, on or about June 9, 2020, were captured by a video camera outside 515 W. 42<sup>nd</sup> Street, New York, New York ("the premises") and other cameras in the vicinity of the premises. After reviewing those video recordings, I have learned, in substance and in part:

a. At approximately 01:20 a.m. on June 9, 2020, an individual later identified as SANCHEZ-SANTA was driving a light-colored two-door Honda Civic sedan with gold wheel rims, bearing a temporary tag ending in 5D2 ("the Honda"). SANCHEZ-SANTA drove the Honda along W. 42<sup>nd</sup> Street and stopped in front of the premises. He parked the Honda alongside a marked NYPD vehicle bearing a specific identification number ("the NYPD Vehicle").

b. SANCHEZ-SANTA exited the Honda from the driver's side door, walked around the rear of the Honda, and approached the NYPD Vehicle. He quickly returned to the passenger's side of the Honda. Once there, SANCHEZ-SANTA held an object later identified as a cloth glove ("the Glove") and lit the Glove on fire. He then stepped away from the Honda toward the NYPD Vehicle and tossed the burning Glove on the pavement underneath the NYPD vehicle. SANCHEZ-SANTA walked around the front of the Honda, reentered the vehicle through the driver's side door, and drove west on W. 42<sup>nd</sup> Street. As he drove off, the Glove continued to burn underneath the NYPD Vehicle.

4. Based on a review of vehicle registration records, I learned that a vehicle with a description matching the Honda, and bearing the tag number visible on the Honda in the surveillance video, was registered to an individual named "Victor A. Sanchez-Santa." The registration gave an address for "Sanchez-Santa" in Queens, New York.

5. On June 10, 2020, I visited the Queens residence listed on the registration for the Honda. VICTOR A. SANCHEZ-SANTA, the defendant, came to the door and agreed to be interviewed. Based on this conversation, and my observations during that visit, I have learned, in substance and in part:

a. Prior to speaking with SANCHEZ-SANTA, I reviewed SANCHEZ-SANTA's rap sheet, which included a photograph of SANCHEZ-SANTA. I recognized the individual I spoke with at SANCHEZ-SANTA's residence as SANCHEZ-SANTA, based on the physical resemblance between the individual and the rap sheet photograph. I also recognized SANCHEZ-SANTA as the individual driving the Honda in the surveillance video recordings.

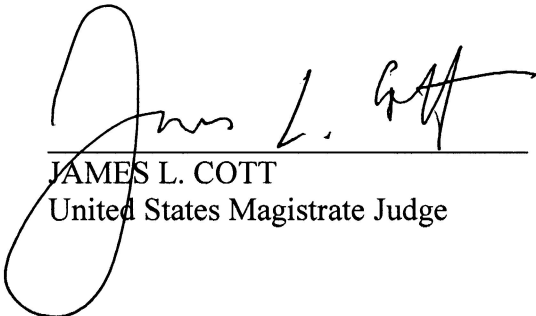
b. I observed a vehicle parked outside SANCHEZ-SANTA's residence, which I identified as the Honda. During our conversation, SANCHEZ-SANTA acknowledged that he owned the Honda. SANCHEZ-SANTA further admitted that he had been driving the Honda in Manhattan around 1:00 a.m. on June 9, 2020.

6. Based on my experience as an NYPD Detective, I have learned that the NYPD is an organization that receives financial assistance from the federal government.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of VICTOR A. SANCHEZ-SANTA, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Edward Simonetti  
Edward Simonetti  
Detective  
New York City Police Department

Sworn to before me this 16<sup>th</sup> day of June, 2020

  
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JAMES L. COTT  
United States Magistrate Judge