

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor
	:	
v.	:	Mag. No. 24-9007
	:	
VASIL PETROV	:	CRIMINAL COMPLAINT
	:	

I, Jaclyn Duchene, being duly sworn, state 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 Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Jaclyn Duchene
Jaclyn Duchene, Special Agent
Department of Homeland Security
Homeland Security Investigations

Special Agent Jaclyn Duchene attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 3rd day of January 2024.

/s/ Cathy L. Waldor
Hon. Cathy L. Waldor
United States Magistrate Judge

ATTACHMENT A

Count One

(Assaulting, Resisting, and Impeding Certain Officers or Employees)

On or about December 27, 2023, in Union County, in the District of New Jersey, and elsewhere, the defendant,

VASIL PETROV,

did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114, namely, Victim-1 as described in this Complaint, while Victim-1 was engaged in and on account of the performance of Victim-1's official duties, involving physical contact with Victim-1, and in doing so, did inflict bodily injury on Victim-1.

In violation of Title 18, United States Code, Section 111(a)(1) and (b).

ATTACHMENT B

I, Jaclyn Duchene, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance, business records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. 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. At times relevant to this Complaint:
 - a. The defendant, VASIL PETROV (“PETROV”), was a national of Bulgaria and had no legal immigration status in the United States.
 - b. “Victim-1” was a Deportation Officer employed by the U.S. Department of Homeland Security, Immigration and Customs Enforcement (“ICE”). As such, Victim-1 was an officer or employee of the United States within the meaning of 18 U.S.C. § 1114.
2. On or about December 27, 2023, PETROV was in the lawful custody of ICE at an ICE facility located in Elizabeth, New Jersey pending removal from the United States.
3. On or about the evening of December 27, 2023, ICE deportation officers, including Victim-1, were processing PETROV at that facility for removal from the United States.
4. During that processing, at approximately 7:19 p.m., PETROV, without provocation, struck Victim-1 in the chin with a closed fist. A struggle then ensued that lasted for approximately two minutes before PETROV was subdued by Victim-1 and other ICE officers and employees.
5. As a result of PETROV’s assault, Victim-1 sustained bodily injury, including a laceration on his chin that required liquid stitches.