AO 91 (Rev. 11/11) Criminal Complaint		P	
UNITED STATES DISTRICT COURT for the			FEB 2 5 2020
Eastern District of Virginia			ERK, U.S. DISTRICT COURT ALEXANDRIA, VIRGINIA
United States of America	)		<u>,</u>
v.	)		
	) Case No.		
	) 1:20MJ86		
MATTHEW DMITRI RICHARDSON			
Defendant(s)	)		x .

# **CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the	date(s) of	February 24, 2020	in the county of	Arlington	in the
Eastern	District of	Virginia , the	e defendant(s) violated:		
Code	Code Section Offense Description		2		
18 U.S.C. § 844(i) The defendant did malic		maliciously attempt to damage	ge and destroy by m	eans of	

The defendant did maliciously attempt to damage and destroy by means of fire, a vehicle used in and affecting interstate and foreign commerce.

This criminal complaint is based on these facts: See attached affidavit.

□ Continued on the attached sheet.

Reviewed By: AUSA Marc J. Birnbaum SAUSA Paul Embroski

Complainant's signature

Officer Michael Landry-Pentagon Police Department *Printed name and title* 

Sworn to before me and signed in my presence.

Date: February 25, 2020

City and state:

Alexandria, VA

Ivan D. Davis United States Magistrate Judge

/s/

### IN THE UNITED STATES DISTRICT COURT FOR TH EASTERN DISTRICT OF VIRGINIA Alexandria Division



UNITED STATES OF AMERICA	)			
<b>v.</b>	) )			
MATTHEW DMITRI RICHARDSON,				
Defendant.	) )			

Case No. 1:20-mj-86

# AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Officer Michael Landry, of the Pentagon Force Protection Agency (PFPA), Pentagon Police Department (PPD), at the Pentagon, in Arlington, Virginia, having been duly sworn, state the following:

1. I am a Police Officer with the PFPA PPD and have been so employed since July, 2013. My duties include performing law enforcement and security-related functions for property occupied by, and under the jurisdiction, custody, and control of the Department of Defense located in the National Capital Region. Before joining PPD, I was a Police Officer at Norfolk Naval Station for two years.

2. This affidavit is submitted in support of a Criminal Complaint and Arrest Warrant, charging that on or about February 24, 2020, at the Pentagon, in the Eastern District of Virginia, MATTHEW DMITRI RICHARDSON did maliciously attempt to damage and destroy by means of fire, a vehicle used in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

3. I personally investigated this matter. I also learned facts set forth below from other law enforcement personnel and witnesses. This affidavit includes information necessary to support

probable cause. It does not include each and every fact known to me or the government.

#### **PROBABLE CAUSE**

4. On February 24, 2020, at approximately 10:55 a.m., while on mobile patrol in Pentagon North Parking, I observed smoke coming from burnt fabric on the ground next to a gray, 2016 Land Rover with New Mexico license plates. I also observed an individual, whom I later identified as RICHARDSON, standing next to the vehicle striking a cigarette lighter to a piece of fabric that was inserted into the vehicle's gas tank. I exited my marked cruiser and identified myself as a Pentagon Police Officer. In response, RICHARDSON told me he was going to "blow this vehicle up" and "himself". I directed RICHARDSON to stop what he was doing and not to move. I attempted to grab RICHARDSON by his wrist to detain him, but he pulled away and ran across the parking lot towards Virginia State Route 110 and onto Virginia State Route 27.

5. A subsequent review of surveillance camera footage showed that RICHARDSON jumped over a fence into Arlington National Cemetery. At approximately 12:15 p.m., PFPA PPD Emergency Response Team members found RICHARDSON near the Arlington House. Officers ordered RICHARDSON to stop. He complied and stated, "I was just trying to blow myself up." I positively identified RICHARDSON as the same individual I had encountered earlier in the Pentagon North Parking Lot.

6. In a search subsequent to arrest, officers recovered a cigarette lighter, gloves, and court documents, among other items, from RICHARDSON. The court documents related to RICHARDSON's arrest on or about February 22, 2020 for two counts of felony assault on a law enforcement officer, in violation of Virginia Code § 18.2-57, in Arlington County, Virginia.

7.

The Land Rover was owned by an active-duty service member assigned to the

Pentagon. This individual advised that he did not know RICHARDSON. The service member purchased the vehicle at a dealership in Albuquerque, New Mexico. Additionally, based on my review of open-source material, I learned that Land Rover vehicles are manufactured outside of the United States.

#### **CONCLUSION**

8. Based on the foregoing, I submit that there is probable cause to believe that on or about February 24, 2020, at the Pentagon, in the Eastern District of Virginia, MATTHEW DMITRI RICHARDSON did maliciously attempt to damage and destroy by means of fire, a vehicle used in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 844(i).

Michael Landry, Police Officer Pentagon Police Department Pentagon Force Protection Agency

Sworn to and subscribed before me this  $\frac{250}{2}$  day of February, 2020.

Ivan D. Davis United States Magistrate Judge

/s/

Alexandria, Virginia