

ADG:WHB
F. #2026R00506

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JOHN JONES,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

LOUIS DUCCESCHI, being duly sworn, deposes and states that he is a Task Force Officer with the Bureau of Alcohol, Tobacco and Firearms, duly appointed according to law and acting as such.

On or about June 19, 2026, within the Eastern District of New York and elsewhere, the defendant JOHN JONES did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire, buildings and other real and personal property used in interstate and foreign commerce and in one or more activities affecting interstate and foreign commerce, to wit: a church located at 855 Bushwick Avenue, Brooklyn, New York (the "Church").

(Title 18, United States Code, Section 844(i))

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to

1. I am a Task Force Officer with the Bureau of Alcohol, Tobacco and Firearms (“ATF”) and have been for approximately six years. I am also a Detective with the New York City Police Department (“NYPD”) and have been for approximately 15 years. I am currently assigned to the Arson & Explosives Task Force, where I investigate major arsons and explosions. I have been involved in the investigation of numerous cases involving arson. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant’s criminal history record; interviews of witnesses; and from reports of other law enforcement officers involved in the investigation.

2. The ATF, along with the NYPD and the New York City Fire Department (“FDNY”), are investigating a fire that occurred on or about June 19, 2026 at the Church in Brooklyn, which appears to have been intentionally set. As described further below, law enforcement has identified the defendant JOHN JONES on video surveillance footage linking him to the fire, including video of JONES purchasing a lighter from a nearby store shortly before the fire at the Church and video of JONES on the Church property in the area of the fire shortly before the fire began.

3. The Church was constructed in the 1850’s and was added to the National Register of Historic Places in 1982. The Church was also designated as a New York City Landmark in 1968.

4. On or about June 19, 2026, the Church sustained significant damage from a fire, as depicted in the images below:

establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.





5. June 19, 2026 video surveillance from a camera on Bushwick Avenue across the street from the Church shows what appears to be an adult with an Afro-textured hairstyle and wearing a dark top and long dark pants approach the church at or around 12:12 p.m.:





The individual appears to make several unsuccessful attempts to enter the church and then departs.

6. Video surveillance from a store located at 1245 Broadway in Brooklyn, which is a short walking distance from the Church, shows what appears to be an adult Black male with the same hairstyle and wearing a dark hooded top and long dark pants enter the store at or around 12:30 p.m. The individual waited to speak with the cashier as depicted in the image below:



7. At or around 12:33 p.m., the individual spoke with the store's cashier.

Audio from the surveillance video appears to reflect that the individual asked the cashier for “a lighter,” and the cashier confirmed that the individual wanted to purchase “a lighter.” The cashier then obtained what appears to be a lighter from a wall of products behind the cashier and placed the lighter on the store counter. The individual picked up the lighter, placed several coins on the counter, looked down at the lighter in his hand, and then departed the store. Images from the footage are below:



8. Video surveillance from a camera on Bushwick Avenue across the street from the Church shows what appears to be the same individual approach the church at or around 12:41 p.m. Between approximately 12:41 p.m. and 12:47 p.m., the individual appears to walk on and around the church property, at times within the church gates, and approach the church exterior, as shown in the images below:



9. A photograph taken by a witness, whose identity is known to the affiant, at or around 1:27 p.m., shows smoke and low burning on an area of the Bushwick Avenue side of the Church:



10. Low burning refers to the lowest physical area where fire damage can be observed. Based on my training and experience, I understand that fire travels vertically upwards and that the lowest point of burning is an indication of a fire's "point of origin," meaning the location where the fire started. In the footage described above in paragraph 8, the individual walking on and around the church property appears to have at times approached areas of the Church exterior near to the location where low burning ultimately appears on the front of the Church in the photograph in paragraph 9. Law enforcement obtained additional surveillance video from the approximate area of the Church on June 19, 2026. The additional surveillance video includes footage from outside 1062 Broadway, Brooklyn, New York of what appears to be the same individual wearing dark pants and a dark hooded sweatshirt underneath a dark jacket at approximately 12:06 p.m. An image from the footage is below:



11. On or about June 28, 2026, the defendant JOHN JONES was arrested by the NYPD in relation to a separate property destruction incident. At the time of JONES's arrest, the below photograph was taken:



I have reviewed NYPD body camera footage of JONES's June 28, 2026 arrest. In this footage, JONES appears to be wearing similar clothing as the individual depicted in the footage described above in paragraphs 5, 6, 7, 8 and 10.

12. In the NYPD body camera footage, the defendant JOHN JONES appears to have a similar hairstyle as the individual depicted in the footage described above in paragraphs 5, 6, 7, 8 and 10, as well as in the photograph depicted above in paragraph 11. JONES additionally appears to have similar facial features to the individual depicted in the footage described above in paragraphs 6, 7 and 10, as well as in the photograph depicted above in paragraph 11. Additionally, in the NYPD body camera footage, JONES appears to move with similar mannerisms as the individual depicted in the footage described above in paragraphs 5, 6, 7, 8 and 10. For these reasons, I believe the individual described in the above paragraphs on or about June 19, 2026 is the defendant JONES.

13. I have spoken with the pastor of the Church, whose identity is known to the affiant. I have also reviewed financial records pertaining to the Church. From this discussion and records, I believe that the Church and its property were used in interstate commerce and in one or more activities affecting interstate commerce. For example, the Church has raised funds by serving as a filming location for television shows and as an event venue. The Church has also purchased various items, such as a musical instrument and sound equipment, from vendors outside of New York State.

WHEREFORE, your deponent respectfully requests that the defendant JOHN JONES be dealt with according to law. Because public filing of this document could result in a risk of flight by JONES, as well as jeopardize the government's ongoing investigation, your deponent respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

/s/ Louis Ducceschi
LOUIS DUCCESCHI
Task Force Officer, Bureau of Alcohol, Tobacco
and Firearms

Sworn to before me this 16th
day of July, 2026 by telephone

James R. Cho
THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK