

Approved: Jamie E. Bagliebter
Assistant United States Attorney

Before: THE HONORABLE KEVIN N. FOX
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : SEALED COMPLAINT
:
- v. - : Violations of 18
:
LUIS SAQUICILI, : U.S.C. §§ 844(i) and
:
Defendant. : 2.
:
: COUNTY OF OFFENSE:
: NEW YORK
:
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

ERIC B. DORNBUSCH, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), and charges as follows:

COUNT ONE
(Arson)

1. On or about January 31, 2018, in the Southern District of New York, LUIS SAQUICILI, the defendant, maliciously damaged and destroyed and attempted to damage and destroy, by means of fire and an explosive a building, vehicle, and other real and personal property used in the interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit, SAQUICILI threw a glass bottle with an ignitable liquid and a lit wick into a bar in New York, New York.

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

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

2. I am an ATF Special Agent with the Arson & Explosives Task Force. 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 conversations with other law enforcement officers and my review of documents and reports prepared by the New York Police Department ("NYPD"), I have learned, in substance and in part:

a. On or about January 31, 2018, members of the Fire Department of New York ("FDNY") responded to a 911 call regarding a fire at a bar that operates at a particular location in New York, New York (the "Bar").

b. When the FDNY members arrived at the scene, they learned that, at approximately 10:45 P.M., an individual threw a glass bottle containing an unknown ignitable liquid with a lit wick (the "Incendiary Device") into the Bar. The bottle broke causing a fire and charring to the floor of the Bar.

c. On or about February 1, 2018, at approximately 1:00 A.M., NYPD officers and I arrived at the Bar.

4. Based on an interview with a witness, who is employed at the Bar, I have learned, in substance and in part:

a. LUIS SAQUICILI, the defendant, has been a patron of the Bar for over one year.

b. On January 31, 2018, at approximately 8:00 P.M., the witness observed SAQUICILI trying to enter the Bar while heavily intoxicated. SAQUICILI was denied entry by the owner of the Bar.

c. On January 31, 2018, at approximately 10:45 P.M., the witness observed SAQUICILI open the front door to the Bar, which is glass, and throw the Incendiary Device onto the floor of the Bar.

d. Law enforcement officials showed the witness a photograph of SAQUICILI and she positively identified him as the person she observed throwing the Incendiary Device into the Bar and as a patron of the Bar for over one year.

5. Based on an interview with a representative from the Bar, I have learned, in substance and in part, that the Bar obtains and sells beverage products that travel through interstate commerce.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of LUIS SAQUICILI, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

Eric B. Dornbusch
Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me this
__ day of February, 2018

THE HONORABLE KEVIN N. FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK