

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

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
: :
v. : Mag. No. 24-10114
: :
JACOB BEACHER : **CRIMINAL COMPLAINT**

I, Jonathan Norbut, 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 Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Jonathan Norbut

Jonathan Norbut, Special Agent
Federal Bureau of Investigation

Special Agent Jonathan Norbut attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 21st day of April, 2024.

Michael A. Hammer

Hon. Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Damage to Religious Property)

On or about April 10, 2024, in Middlesex County, in the District of New Jersey, and elsewhere, the defendant,

JACOB BEACHER,

did intentionally obstruct and attempt to obstruct, by force and threat of force, persons in the enjoyment of their free exercise of religious beliefs, and such offense was in and affected interstate and foreign commerce. Damage and destruction of property in excess of \$5,000 resulted from of the acts committed by the defendant.

In violation of Title 18, United States Code, Section 247(a)(2).

COUNT TWO
(False Statements)

On or about April 12, 2024, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

JACOB BEACHER,

did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, as set forth in paragraph 9 of this Complaint, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely a criminal investigation conducted by the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1001(a)(2).

ATTACHMENT B

I, Jonathan Norbut, am a Special Agent of the Federal Bureau of Investigation. The information contained in this 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 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.

The Defendant and His Criminal Conduct

1. The defendant JACOB BEACHER (“BEACHER”) resided in and around North Plainfield, New Jersey.
2. On or about April 10, 2024, at approximately 2:39 a.m., during the Eid-al-Fitr¹ holiday, video surveillance footage showed BEACHER walking toward the rear door of the Center for Islamic Life at Rutgers University (the “CILRU”), located in New Brunswick, New Jersey. Soon after, at approximately 2:41 a.m.², an intruder, later determined to be BEACHER, forcibly entered the CILRU through its back door. Specifically, BEACHER broke a glass pane on the door, pushed through a piece of plexiglass that was affixed to the interior side of the door, and then manually opened the door from the inside by reaching through the broken glass to unlatch a deadbolt lock.
3. Once inside the CILRU, BEACHER damaged the CILRU’s property, including several religious artifacts, such as Turbah prayer stones³ and numerous items that contained holy language from the Qur’an, Islam’s sacred scripture. A current estimate of the damage that BEACHER caused is approximately \$40,000. BEACHER also stole a Palestinian flag and at least one charity box belonging to the CILRU.

¹ Muslims worldwide celebrate Eid-al-Fitr because it marks the end Ramadan, the ninth and holiest month of the Muslim calendar, which Muslims observe as a month of fasting, prayer, studying, and reflection.

² The doors to various buildings at Rutgers, including the CILRU, utilize a swipe pad system that documents when a door is opened and closed.

³ Turbah prayer stones are clay stones on which Muslims prostrate during prayer.

4. At approximately 3:05 a.m., BEACHER exited the CILRU using the same back door. Less than one minute later, at approximately 3:06 a.m., video surveillance captured BEACHER pacing the area by the Rutgers Student Center (the “Student Center”), which is approximately 75 to 100 feet from the CILRU. Then at approximately 3:09 a.m., BEACHER used his bicycle to go from the Student Center toward Buccleuch Park in New Brunswick.

5. The damage BEACHER caused was first discovered that same day, at approximately 4:26 a.m., when a Rutgers employee was walking past the CILRU. Because the damage was extensive, the CILRU’s chaplain canceled all Eid-al-Fitr religious celebrations that were scheduled, and the CILRU remained closed on April 11, 2024 and April 12, 2024.

The Investigation

6. On or about April 14, 2024, two individuals reported to law enforcement that they found a donation box belonging to the CILRU on the east side of Buccleuch Park, located approximately .6 miles from the CILRU. Lawfully-collected historical cell-site data revealed that BEACHER’s cell phone was located at the east side of Buccleuch Park shortly after the break-in at the CILRU.

7. A canvass of video surveillance footage from immediately before BEACHER broke into the CILRU revealed, among other things, the following (all times are approximate):

- a. 1:55 a.m.: BEACHER—wearing a green long-sleeved shirt, khaki pants, and a backpack—walked into a snacks and smoke shop (“Business-1”), which was located approximately three blocks from the CILRU.
- b. 2:23 a.m.: BEACHER, wearing what appeared to be the same green shirt, walked behind the Student Center and out of sight.⁴
- c. 2:29 a.m.: BEACHER walked back into view behind the Student Center, but was now wearing a blue long-sleeved shirt, which he apparently changed into before breaking into the CILRU.
- d. 2:39 a.m.: approximately two minutes before breaking into the CILRU, BEACHER walked from the Student Center, out of view of video cameras, in the direction of the CILRU.

⁴ Additional video footage from on or about April 9, 2024, at approximately 8:00 p.m, depicted BEACHER riding a bicycle up to the same area and subsequently walking away. That is the same bicycle BEACHER used when fleeing the CILRU.

8. Based on a review of all pertinent video surveillance footage from approximately 2:30 a.m. to 3:30 a.m., BEACHER was the only person seen in the immediate vicinity of the CILRU leading up to, and then soon after, the break in.

9. On or about April 12, 2024, BEACHER voluntarily agreed to speak to law enforcement in North Plainfield, New Jersey. An FBI Special Agent advised BEACHER to be truthful and that lying to the FBI was a crime. During that interview, BEACHER confirmed to law enforcement, in substance and in part, that he was the person depicted in the above-referenced video footage inside Business-1, as well as in the other video footage that showed him walking and biking near the Student Center on or about April 10, 2024. BEACHER falsely denied, however, breaking into the CILRU.