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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Douglas E. Arpert  
 :  
 v. : Mag. No. 22-6027 (DEA)  
 :  
 DION MARSH : **CRIMINAL COMPLAINT**  
 :

I, Timothy M. Walsh 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 of 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.

s/TIMOTHY M. WALSH  
Timothy M. Walsh, Special Agent  
Federal Bureau of Investigation

Attested to me by telephone,  
Pursuant to FRCP 4.1(b)(2)(A)

April 19, 2022  
in the District of New Jersey

  
\_\_\_\_\_  
HONORABLE DOUGLAS E. ARPERT  
UNITED STATES MAGISTRATE JUDGE

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APR 19 2022  
DOUGLAS E. ARPERT  
U.S. MAGISTRATE JUDGE

**ATTACHMENT A**

**COUNT 1**  
**(Hate Crimes Prevention Act)**

On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

**DION MARSH,**

willfully caused bodily injury to Victim 1 by striking Victim 1 repeatedly, because of Victim 1's actual and perceived race and religion.

In violation of Title 18, United States Code, Section 249(a)(1).

**COUNT 2**  
**(Hate Crimes Prevention Act)**

On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

**DION MARSH,**

willfully caused bodily injury, and through the use of a dangerous weapon attempted to cause bodily injury, to Victim 2, by striking Victim 2 with a motor vehicle, because of Victim 2's actual and perceived race and religion, and the offense included an attempt to kill.

In violation of Title 18, United States Code, Section 249(a)(1).

**COUNT 3**  
**(Hate Crimes Prevention Act)**

On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

**DION MARSH,**

willfully caused bodily injury, and through the use of a dangerous weapon attempted to cause bodily injury, to Victim 3, by striking Victim 3 with a motor vehicle and by stabbing Victim 3 with a knife, because of Victim 3's actual and perceived race and religion, and the offense included an attempt to kill.

In violation of Title 18, United States Code, Section 249(a)(1).

**COUNT 4**  
**(Hate Crimes Prevention Act)**

On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

**DION MARSH,**

willfully caused bodily injury, and through the use of a dangerous weapon attempted to cause bodily injury, to Victim 4 by striking Victim 4 with a motor vehicle, because of Victim 4's actual and perceived race and religion, and the offense included an attempt to kill.

In violation of Title 18, United States Code, Section 249(a)(1).

**COUNT 5**  
**(Carjacking)**

On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, defendant

**DION MARSH**

with the intent to cause serious bodily harm, did knowingly take a motor vehicle that had moved in interstate and foreign commerce from another person by force, violence, and intimidation.

In violation of Title 18, United States Code, Section 2119(1).

## **ATTACHMENT B**

I, Timothy M. Walsh, am a Special Agent with the Federal Bureau of Investigation. I have participated in this investigation, discussed this matter with other law enforcement officers, and have reviewed documents and other materials. I have knowledge of the following facts. Because this criminal complaint is being submitted only for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause. Unless specifically indicated, all conversations and statements described herein are related in substance and in part, and all dates and figures are approximate.

1. On April 8, 2022, at approximately 1:18 p.m., in Lakewood, New Jersey, defendant DION MARSH forced a visibly identifiable Orthodox Jewish man (Victim 1) out of his car by physically striking Victim 1. MARSH took control of Victim 1's car, a 2016 Toyota Camry that was manufactured in the Commonwealth of Kentucky (the "Camry"), and drove away with the stolen car. A surveillance video in the area captured MARSH arriving in the area prior to the carjacking of Victim 1. MARSH's assault caused Victim 1 to have injuries, including a black eye and a wound that required stitches. Victim 1 was taken to a hospital where he received medical treatment for injuries suffered from MARSH's assault.

2. Several hours later, MARSH was again in Lakewood but driving a different car, a red Honda Accord sedan (the "Honda"). At approximately 6:06 p.m., MARSH deliberately drove the Honda into another visibly identifiable Orthodox Jewish man who was walking (Victim 2). MARSH's assault on and attempt to kill Victim 2 caused Victim 2 to have several broken bones. Victim 2 was taken to a hospital where he received medical treatment for injuries suffered from MARSH's assault.

3. At approximately 6:55 p.m., MARSH, once again driving the Camry that he had stolen from Victim 1, used it to deliberately strike another visibly identifiable Orthodox Jewish man who was walking in Lakewood (Victim 3). After hitting Victim 3 with the stolen car, MARSH got out of the Camry and stabbed Victim 3 in the chest with a knife. MARSH's assault on and attempt to kill Victim 3 caused Victim 3 to suffer a stab wound and other injuries. Victim 3 was taken to a hospital where he received medical treatment for injuries suffered from MARSH's assault.

4. At approximately 8:23 p.m., MARSH, still driving the Camry that he had stolen from Victim 1, used it to deliberately strike another visibly identifiable Orthodox Jewish man who was walking in Jackson Township, New Jersey (Victim 4). MARSH's assault on and attempt to kill Victim 4 caused Victim 4 to

have several broken bones and internal injuries. Victim 4 was taken to a hospital where he received medical treatment for injuries suffered from MARSH's assault.

5. At approximately 12:00 a.m., on April 9, 2022, law enforcement arrested MARSH at his residence in Manchester, New Jersey. After waiving his *Miranda* rights, MARSH gave a videotaped statement during which he stated, in sum and substance:

a. On April 8, 2022, MARSH was attempting to hitch a ride back to his residence in Manchester. When he could not get a ride, he attempted to get into multiple cars and eventually punched an individual (Victim 1) and took his car (the Camry) and drove home.

b. Later, MARSH drove his grandmother's vehicle (the Honda) back to Lakewood. As he was driving, he struck a man with the Honda (Victim 2), which damaged the Honda. He then drove the Honda back to his house in Manchester.

c. Thereafter, MARSH drove back to Lakewood in the stolen car (the Camry). As MARSH was driving, he struck another man with the Camry (Victim 3). MARSH then got out of the car and stabbed the man (Victim 3) using a steak knife that he had brought from his house.

d. MARSH continued driving the stolen vehicle, and hit another man (Victim 4). When MARSH hit this man, MARSH drove the vehicle over the curb, disabling the Camry.

e. When MARSH was asked why he did all the acts he committed, he stated, "it had to be done," and that "these are the real devils." When he was asked to whom he was referring, MARSH stated, "the Hasidic Jews." When asked if he felt like they were going against his religion, MARSH replied, "100%."

6. MARSH subsequently told a corrections officer, "this had to be done," "they had this coming," likely referring to his Jewish victims, and "I can't wait for more charges," likely referring to the criminal charges then filed against him by state authorities.