

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III  
 :  
 v. : Magistrate. No. 26-12024  
 :  
 JOVAN YOUNG : **CRIMINAL COMPLAINT**  
 :  
 : **FILED UNDER SEAL**


I, Special Agent Kyle Mathie, 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.

  
\_\_\_\_\_  
Kyle Mathie  
Special Agent  
Federal Bureau of Investigation

Special Agent Kyle Mathie attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 30th day of MARCH, 2026.

JAMES B CLARK III (KM)  
\_\_\_\_\_  
Hon. James B. Clark, III  
United States Magistrate Judge

**ATTACHMENT A**

**Count 1**  
**(Kidnapping)**

On or about December 24, 2025, in Morris County, in the District of New Jersey and elsewhere, the defendant,

**JOVAN YOUNG,**

did knowingly and unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold Victim-1 for ransom and reward and otherwise, and did willfully transport Victim-1 in interstate commerce from New York to New Jersey and did use a means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Section 1201(a)(1).

**Count 2**  
**(Possession of a Firearm and Ammunition by a Convicted Felon)**

On or about December 25, 2025, in Morris County, in the District of New Jersey and elsewhere, the defendant,

**JOVAN YOUNG,**

knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely a Glock 48, 9 mm firearm, bearing serial number AEAD865, affixed with a green laser and loaded with a Glock magazine and ten (10) 9 mm rounds of ammunition, as well as two additional firearm magazines containing twenty (20) additional 9 mm rounds of ammunition, and the firearm and ammunition were in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

## ATTACHMENT B

I, Kyle Mathie, am a Special Agent of the Federal Bureau of Investigation. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including my conversations with law enforcement officers, and my review of reports, recordings, documents, and photographs of the evidence. 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.

1. On or about December 24, 2025, while defendant JOVAN YOUNG ("YOUNG") and his girlfriend ("Victim-1") were travelling in YOUNG's 2014 BMW X1 (the "BMW") from Georgia to New York to celebrate Christmas with Victim-1's family in Far Rockaway, Queens, New York, YOUNG did kidnap and hold for ransom or reward or otherwise Victim-1 without her consent.

2. YOUNG and Victim-1 began traveling from Georgia to New York in YOUNG's BMW on or about December 23, 2025, and engaged in multiple verbal and physical disputes over the course of their trip. Following a dispute that occurred on or about December 24, 2025, while Victim-1 and YOUNG were in New Jersey, Victim-1 moved to the backseat of the BMW to physically distance herself from YOUNG. Later that evening, during another verbal dispute in New York while YOUNG was driving and Victim-1 was still in the backseat of the BMW, YOUNG pulled out a gun, turned to Victim-1, and shot her.

3. Victim-1, who observed that the handgun that YOUNG used to shoot her had a green light, immediately lost feeling in her legs after being hit with the bullet in her abdomen.

4. At or about 6:12 p.m. on December 24, 2025, shortly after she was shot by YOUNG, Victim-1 called 911 using her personal cell phone. The call placed by Victim-1 routed to the New York City Police Department based on the location of the phone in Staten Island, New York at the time of the call. During the call, Victim-1 advised the dispatcher that she was "dead" and said "he shot me." After the dispatcher asked for additional information regarding Victim-1's location, YOUNG took Victim-1's cell phone from her, and the call disconnected shortly thereafter.

5. After Victim-1 was shot, she repeatedly begged YOUNG to take her to a hospital. Instead of seeking help for Victim-1, YOUNG travelled from New York to New Jersey in the commission of and in furtherance of the kidnapping.

6. With Victim-1 still in the backseat of the BMW, YOUNG visited [REDACTED] in or around Parsippany, New Jersey. After arriving at [REDACTED] house on the evening of December 24, 2025, YOUNG left Victim-1 in the BMW outside the house while he was inside the house for approximately 30 minutes. During that time, Victim-1 was able to open the BMW's passenger-side rear door, which set off the BMW's alarm system. YOUNG then exited the house, slammed the BMW door shut, and locked the BMW's doors with Victim-1 still inside.

7. When Victim-1's family members contacted YOUNG for information on Victim-1's location on the evening of December 24, 2025, YOUNG made false statements by phone and text messages to lead them to believe that Victim-1 was no longer in the BMW because he voluntarily left Victim-1 in the area of Queens, New York, and that YOUNG was looking for Victim-1. YOUNG also made false statements over the phone to police officers in Far Rockaway, Queens, New York, who were actively looking for Victim-1 in the area of Queens, New York on the evening of December 24, 2025 after being contacted by Victim-1's family members. Separately, while Victim-1 was still in the backseat of the BMW, YOUNG spoke with another individual ("Individual-1") on the phone and discussed with Individual-1 shooting Victim-1 and whether to bury her body.

8. Later on December 24, 2025, at or about 9:00 pm, YOUNG left Victim-1 on the side of the road approximately 1,200 feet from a hospital in or around Denville, New Jersey. Around the same time, the Denville Police Department received a 911 call from YOUNG, pretending to be "Eric Johnson," reporting an injured female laying on the side of the road.

9. Denville Police Department responded to the area and located Victim-1 with a gunshot wound to her abdomen area. At that time, Victim-1 told law enforcement that YOUNG shot her. Victim-1 was then transported to the hospital in critical condition and was later determined to be paralyzed as a result of a spinal cord injury from the gunshot.

10. After Victim-1 was transported to the hospital, YOUNG impersonated Victim-1 in communications with Victim-1's sister, while Victim-1 was incapacitated and not in possession of her phone, including to say: "it wasn't him girl" and "i'm ok."

11. On December 25, 2025, at or about 12:16 p.m., law enforcement learned that Victim-1's phone was located in the area of [REDACTED] Boonton Avenue, Boonton, New Jersey. Law enforcement subsequently located YOUNG's BMW in the area of [REDACTED] Church Street, which is located directly behind [REDACTED] Boonton Avenue.

12. On December 25, 2025, at or about 5:49 p.m., law enforcement observed YOUNG exiting [REDACTED] Boonton Avenue carrying a red backpack and arrested him shortly thereafter.

13. Law enforcement obtained search warrants for the backpack in YOUNG's possession at the time of his arrest, his person, and his BMW. A search of the backpack revealed that it contained a Glock 48, 9 mm firearm, bearing serial number AEAD865, affixed with a green laser and loaded with a Glock magazine and ten (10) 9 mm rounds of ammunition, as well as two additional firearm magazines containing twenty (20) additional 9 mm rounds of ammunition, and two phones, including Victim-1's phone.

14. The firearm and ammunition recovered during the search were manufactured outside of the State of New Jersey, and thus moved in and affected interstate commerce prior to December 24, 2025.

15. Prior to December 24, 2025, YOUNG knew he was a convicted felon as he had several prior felony convictions for which he received a sentence of more than one year, including:

- a. On or about January 22, 2010, YOUNG was convicted in the Superior Court of New Jersey, Morris County, of possession with intent to distribute within 500 feet of certain public property, in violation of N.J.S.A. 2C:35-7.1A, and manufacturing/distributing a controlled dangerous substance or intent to manufacture/distribute a controlled dangerous substance, in violation of 2C:35-5A(1), crimes punishable by imprisonment for a term exceeding one year, and for which YOUNG was sentenced to 5 years' imprisonment.
- b. On or about June 21, 2019, YOUNG was convicted in the Superior Court of New Jersey, Morris County, of certain persons not to have weapons or ammunition, in violation of N.J.S.A. 2C:39-7A, a crime punishable by imprisonment for a term exceeding one year, and for which YOUNG was sentenced to 18 months' imprisonment.
- c. On or about June 28, 2019, YOUNG was convicted in the Superior Court of New Jersey, Morris County, of manufacturing/distributing a controlled dangerous substance or intent to manufacture/distribute a controlled dangerous substance, in violation of 2C:35-5A(1), a crime punishable by imprisonment for a term exceeding one year, and for which YOUNG was sentenced to 5 years' imprisonment.