
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
JEROME CONOVER : Mag. No. 11-3050 (PS)

ORIGINAL FILED
MAR 17 2011
PATTY SHWARTZ
U.S. MAG. JUDGE

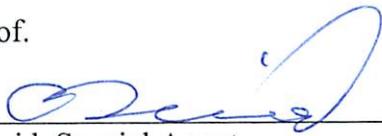
I, Ajit David, being duly sworn state the following is true and correct to the best of my knowledge and belief:

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 page and made a part hereof.



Ajit David, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in presence,

March 17, 2011, at Newark, New Jersey

HONORABLE PATTY SHWARTZ
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One

From on or about January 2, 2011 through on or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JEROME CONOVER, did knowingly conspire and agree with others to commit an offense against the United States, namely, theft of a motor vehicle by force, violence and by intimidation, contrary to Title 18, United States Code, Section 2119.

In violation of Title 18, United States Code, Section 371.

Count Two

On or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JEROME CONOVER, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 1997 Lincoln Continental, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely S.Q., by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

Count Three

On or about January 12, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant JEROME CONOVER, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a 2004 Dodge Durango, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely J.M., by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

ATTACHMENT B

I, AJIT DAVID, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Where statements of others are set forth herein, these statements are related in substance and in part. 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 Sunday, January 2, 2011, at or around 8:45 p.m., a silver 2003 Acura TL ("Acura") was carjacked from victim M.W. at gunpoint in Newark, Essex County, New Jersey (hereinafter "the Acura Carjacking"). M.W. later provided a statement to law enforcement regarding the Acura Carjacking. M.W. was inside M.W.'s Acura when two black males wearing dark clothing walked past M.W. The two males turned around, now wearing black masks, and approached the vehicle. One of them pointed a black handgun at M.W., who got out of the Acura. The two males drove away in M.W.'s Acura.

2. On or about Monday, January 3, 2011, the carjacked Acura was involved in an accident and recovered by law enforcement.

3. Several days later, on or about Wednesday, January 12, 2011, latent fingerprints recovered from the carjacked Acura were positively identified as belonging to defendant JEROME CONOVER ("defendant CONOVER").

4. On or about Wednesday, January 12, 2011, at or around 12:15 p.m., a black 1997 Lincoln Continental was carjacked from victim S.Q. at gunpoint in Newark, Essex County, New Jersey (hereinafter the "Lincoln Carjacking"). S.Q. later provided a statement to Newark police officers regarding the Lincoln Carjacking. According to S.Q., two black males were walking down the street towards his vehicle as he was about to park his car. S.Q. parked the car and turned the engine off. He was attempting to get out of the car when both black males approached S.Q. One black male, wearing a hoodie that covered his head and a black snow suit, pointed a black shotgun at S.Q. and ordered him to get out of the car and to lie on the ground. The other black male wearing dark clothing stood on the passenger side of the vehicle. S.Q. complied. The two males jumped inside S.Q.'s 1997 Lincoln Continental and drove away.

5. On or about Wednesday, January 12, 2011, at or around 12:35 p.m., a 2004 burgundy Dodge Durango was carjacked from victim J.M. at gunpoint in Newark, Essex County, New Jersey (hereinafter the "Durango Carjacking"). J.M. later provided a statement to Newark police officers regarding the Durango Carjacking. According to J.M., she noticed a black vehicle tailgating her car and pulled over to the right side of the street to allow the black vehicle to pass. The black vehicle stopped directly in front of J.M. Two black males exited the black vehicle. One of them pointed a long, black gun at J.M. and ordered her to get out of the car. J.M. got out of the car. The two individuals drove away in her 2004 burgundy Dodge Durango, leaving

behind the black vehicle, with the car doors open, on the street. The black vehicle that was abandoned on the street was identified as the car that had been stolen from S.Q. in connection with the Lincoln Carjacking.

6. On or about Wednesday, January 12, 2011, at or around 1:30 p.m., law enforcement from the Newark Police Department were driving in an unmarked vehicle when they observed the Durango that had been reported stolen in connection with the Durango Carjacking traveling at a high rate of speed. They activated their lights and sirens and followed the Durango, which crashed into three vehicles. The Durango was stopped in the crash.

7. Two individuals from the Durango exited the vehicle and fled by foot. One of them, later identified as JAHLIL THOMAS, was observed exiting the vehicle wearing all black clothing and in possession of a shotgun. The second individual, later determined to be defendant CONOVER, was observed wearing a gray hoodie. Law enforcement observed THOMAS fleeing the scene and dropping the shotgun. Pursuant to a brief foot chase, law enforcement apprehended THOMAS and recovered the shotgun. At the time of his arrest, THOMAS was wearing black snow pants and a black jacket.

8. After THOMAS was arrested, six photographs, including a photograph of defendant THOMAS, were shown sequentially to S.Q, the victim of the Lincoln Carjacking. S.Q. positively identified defendant THOMAS as the individual who pointed a shotgun at him and stole his car. THOMAS was charged in a four count criminal complaint in this District on January 13, 2011.

9. On or about January 19, 2011, several days after defendant CONOVER's fingerprints were identified in connection with the investigation of the Acura Carjacking, defendant CONOVER was located in Newark, New Jersey and arrested by law enforcement. When informed by law enforcement that he had been arrested pursuant to a warrant, defendant CONOVER stated in substance and in part, "A warrant for what? Carjacking?"

10. Subsequent to his arrest, defendant CONOVER stated in substance and in part that on or about January 12, 2011: (1) he was inside the carjacked Durango with one other person when it crashed; (2) he ran from the scene of the Durango crash; (3) he knew that law enforcement had apprehended THOMAS after the Durango crash; and (4) he was wearing black sweatpants, black boots and a gray hoodie that day. Conover denied knowing at the time of the crash that the Durango had been carjacked.

11. M.W.'s 2003 Acura was determined to have been manufactured in Marysville, Ohio. S.Q.'s 1997 Lincoln Continental was determined to have been manufactured in Newark, Delaware and J.M.'s 2004 Dodge Durango was determined to have been manufactured in Wixom, Michigan.