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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA : Honorable Cathy L. Waldor  
v. :  
: Magistrate No. 12-7051  
BRYAN YOUNG : **CRIMINAL COMPLAINT**

I, James D. Boazzo, 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

  
James D. Boazzo, Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
on January 20<sup>th</sup>, 2012 at Newark, New Jersey

HONORABLE CATHY L. WALDOR  
United States Magistrate Judge

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

From on or about November 5, 2008 through on or about November 18, 2009, in Ocean and Essex Counties, in the District of New Jersey and elsewhere, defendant

**BRYAN YOUNG**

did knowingly and fraudulently conceal from a custodian, trustee, marshal, and other officer of the court charged with the control and custody of property, and, in connection with a case under Title 11 of the United States Bankruptcy Code, from creditors and the United States Trustee, property belonging to the estate of a debtor.

In violation of Title 18, United States Code, Section 152(1) and Section 2.

**COUNT TWO**

From on or about December 12, 2008 through on or about February 13, 2009, in Essex County, in the District of New Jersey and elsewhere, defendant

**BRYAN YOUNG**

did knowingly and fraudulently make a material false oath and account in and in relation to a case under Title 11 of the United States Bankruptcy Code.

In violation of Title 18, United States Code, Section 152(2) and Section 2.

## ATTACHMENT B

I, James D. Boazzo, am a Special Agent with the Federal Bureau of Investigation. I have knowledge about the facts set forth below from my involvement in the investigation, review of reports and documents, and discussions with other law enforcement officials. This complaint is submitted for a limited purpose, and I have not set forth each and every fact that I know concerning this investigation. All statements described herein are relayed in substance and in part.

1. At all times relevant to this complaint, Defendant BRYAN YOUNG ("YOUNG") was a resident of Toms River, in Ocean County, New Jersey.
2. On or about November 5, 2008, YOUNG filed for individual Chapter 7 bankruptcy protection. That case was captioned In re: Bryan Young, Case No. 08-32333 (RTL) (Bankr. D.N.J.).

### **COUNT ONE** **(Concealment of Assets)**

3. In his bankruptcy petition (hereinafter the "Petition"), YOUNG failed to report more than \$1.5 million dollars in personal assets.
4. Specifically, in his Petition, Schedule B - Personal Property (hereinafter the "Schedule B"), YOUNG failed to disclose, as he was required by law to do, the existence of four financial accounts, including (1) an account at Amboy Bank, which had a balance of approximately \$100,380 on or about March 31, 2008, (2) an account at ING Direct, which had a balance of approximately \$40,255 on or about April 30, 2008, and (3) an account at Wachovia Bank, from which YOUNG made withdrawals of approximately \$420,000 in or about August 2008, and (4) an account at TD Ameritrade, which had a balance of approximately \$127,620 on or about March 31, 2008, and \$74,485 on or about June 30, 2008. In addition, YOUNG failed to disclose the purchase of approximately \$13,000 of furniture in or about August and September 2008.
5. Moreover, in the event that any of the above-listed bank accounts were closed as of the date of the filing of his Petition, YOUNG failed to disclose, as he was required by law to do, any closed financial accounts in his Petition, Statement of Financial Affairs (hereinafter the "Statement"). Further, in his Statement, originally filed by YOUNG on or about November 5, 2008, and subsequently amended by Young on or about November 18, 2009, he listed no income other than from employment or operation of business. However, according to documents obtained from eBay Inc., YOUNG had sales of approximately \$64,569 in or about 2007, and approximately \$188,415 in or about 2008. In his Statement and his Schedule B, YOUNG also failed to disclose, as he was required by law to do, transfers of (1) approximately \$253,000, on or about June 26, 2008, into a bank account in the name of his son, and (2) approximately \$248,000, on or about July 21, 2008, into YOUNG's First Union Bank account.

6. Further, in the amendment to his Statement, YOUNG failed to disclose the sale of his 2003 Ford truck, on or about October 18, 2008, in the amount of approximately \$10,000.

**COUNT TWO**  
**(False Oaths)**

7. On or about December 12, 2008, and on or about February 13, 2009, YOUNG testified during his Section 341(a) Creditors Hearing (hereinafter the "341 Hearing") and his Rule 2004 Examination (hereinafter the "2004 Examination"), respectively. During both testimonies, YOUNG made numerous false statements under oath.
8. Specifically, during the 341 Hearing, YOUNG testified that he did not own any stocks, bonds, or mutual funds. However, at the time of the filing of his Petition, on or about November 5, 2008, YOUNG's TD Ameritrade investment statement showed investments in stocks, bonds, and mutual funds. The value of these investments was approximately \$127,620, on or about March 31, 2008, and approximately \$74,485, on or about June 30, 2008.
9. In addition, during the Rule 2004 examination, YOUNG testified that he had only one bank account, and that it was maintained at Sovereign Bank. However, at the time of the filing of his Petition, YOUNG also had bank accounts at Amboy Bank, ING Direct, and Wachovia.
10. Further, during the 2004 Examination, YOUNG testified that he owned only one motor vehicle, a 2006 Ford F-350. However, at the time of the filing of his Petition, according to records obtained from the New Jersey Department of Motor Vehicles, YOUNG also owned a 1993 Mitsubishi GT and a 2003 Ford truck.
11. Finally, during the 2004 examination, YOUNG testified that he had no assets over and above the amount listed on his Schedule B. However, YOUNG had at least \$13,000 in furniture that was not disclosed on his Schedule B.