

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

UNITED STATES OF AMERICA : Hon. André M. Espinosa  
: :  
v. : Mag. No. 23-11221  
: :  
JOEL RAMON GARCIA : **CRIMINAL COMPLAINT**  
: :  
: **FILED UNDER SEAL**

I, Special Agent John Havens, 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.

/s/ John Havens/JMM

John Havens, Special Agent  
Federal Bureau of Investigation

Special Agent John Havens attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 17th day of November, 2023.

/s/ Hon. Andre M. Espinosa/JMM

Hon. André M. Espinosa  
United States Magistrate Judge

**ATTACHMENT A**

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

Between on or about November 15, 2023 through on or about November 17, 2023, in the District of New Jersey and elsewhere, the defendant,

**JOEL RAMON GARCIA**

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

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

## ATTACHMENT B

I, John Havens, am a Special Agent of the Federal Bureau of Investigation (the "FBI"). The information contained in the 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, phone records, 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.

1. At times relevant to this Complaint, the defendant, JOEL RAMON GARCIA ("GARCIA") resided in the vicinity of Paterson, New Jersey.

2. The FBI, in conjunction with other law enforcement agencies, is presently investigating the kidnapping and holding for ransom of a certain victim, "Victim-1," between on or about November 15, 2023 until on or about November 17, 2023. This investigation has established that GARCIA participated in that kidnapping.

3. More specifically, law enforcement began investigating the kidnapping on or about November 15, 2023 at approximately 11:00pm, when the Paterson Police Department received a call from Victim-1's father reporting that Victim-1 had been abducted. Victim-1's father reported that, at approximately 10:35pm, he received a call from Victim-1 on Victim-1's telephone (the "Victim-1 Phone"), identified as such by the incoming call number, which Victim-1's father recognized as belonging to Victim-1. During that call, Victim-1 was on the phone and told Victim-1's father, in substance, that he had been kidnapped and asked Victim-1's father to provide his kidnappers a ransom payment of \$30,000. Victim-1 did not provide a form of transaction, nor any instructions on where to send or drop the money.

4. The Paterson Police Department transported Victim-1's father to the Paterson police station for further questioning. Upon arrival, at approximately 11:50pm, Victim-1's father received a second phone call from the Victim-I Phone, but the caller was an unknown individual. The unknown individual said, in substance, that he knew the police were involved and threatened that Victim-1's fingers would be chopped off if Victim-1's father did not provide \$30,000.

5. On or about November 16, 2023, law enforcement obtained cell phone location information on the Victim-I Phone from "Provider-1," the cellular carrier of

the Victim-1 Phone, based on exigent circumstances. That information showed the following:

a. On or about November 15, 2023, at approximately 5:48pm, the Victim-I Phone was located in the area of Paterson, New Jersey.

b. On or about November 15, 2023, at approximately 11:56pm, the Victim-I Phone was located in the area of Dedham, Massachusetts.

c. On or about November 16, 2023, at approximately 3:15pm, the Victim-I Phone was still located in the area of Dedham, Massachusetts.

6. On or about November 16, 2023, law enforcement obtained from Provider-1, based on exigent circumstances, tower dumps—that is, lists of all cellular numbers that connected to a given cellular tower within a defined time period—for two Provider-1 towers: *first*, a particular Provider-1 tower located in Paterson, New Jersey, for the time period of approximately one minute around approximately 5:48pm on or about November 15, 2023, and *second*, a particular Provider-1 tower located in West Roxbury, Massachusetts, for the time period of approximately one minute around approximately 11:56pm on or about November 15, 2023.

7. There were only two numbers that connected to both towers within those time periods: first, the Victim-1 Phone, and second, another phone that, as discussed below, law enforcement has determined to belong to GARCIA (the “GARCIA Phone”).

8. More specifically, the tower dumps discussed above disclosed to law enforcement a certain International Mobile Subscriber Identity, or “IMSI,” number, signifying a particular Provider-1 subscriber that connected to both towers within the time periods described above. Later on or about November 16, 2023, based on exigent circumstances, law enforcement obtained from Provider-1 the subscriber information associated with that IMSI number—that is, the IMSI number associated with the GARCIA Phone. Those records revealed that the subscriber for the GARCIA Phone was an individual named “Joel Ramon Garcia”—that is, the defendant, GARCIA.

9. On or about November 16, 2023, law enforcement obtained from Provider-1, based on exigent circumstances, timing advance data—which corresponds to the length of time a signal takes to reach a cell tower from a cellular phone and can be used to estimate the location of a cellular phone at an approximate time—for both the Victim-I Phone and the GARCIA Phone. The timing advance data showed the following:

a. On or about November 15, 2023, at approximately 5:27pm, timing advance data showed that the Victim-I Phone was located in the area of Paterson, New Jersey, and, at approximately 5:28pm, timing advance data showed that the GARCIA Phone was located in the area of Paterson, New Jersey.

b. On or about November 15, 2023, at approximately 6:03pm, timing advance data showed that the GARCIA Phone was located in the area of Teaneck, New Jersey, and at approximately 6:04pm, timing advance data showed that the Victim-I Phone was located in the area of Teaneck, New Jersey.

c. On or about November 15, 2023, at approximately 10:33pm, timing advance data showed that the GARCIA Phone was located in the area of North Grafton, Massachusetts, and at approximately 10:34pm, timing advance data showed that the Victim-I Phone was located in the area of North Grafton, Massachusetts.

10. On or about November 17, 2023, at between approximately 4:00am and 5:00am, Victim-1 returned to Victim-1's home (the "Victim-1 Home") in Paterson, New Jersey. Later on or about November 17, 2023, Victim-1 went to the Paterson police station and told law enforcement, in substance, the following:

a. Victim-1 was kidnapped on or about November 15, 2023 at around 5:45pm in Paterson, New Jersey by multiple individuals, including one particular individual, "Individual-1," who possessed and brandished a firearm during the kidnapping—and, as discussed below, was later identified by Victim-1 as GARCIA.

b. After the kidnapping, Individual-1 and others transported Victim-1 to a location in Massachusetts. The group left Paterson, New Jersey at approximately 5:45pm on that date and arrived at the Massachusetts location at around 11:45pm on that date.

c. As discussed above, Victim-1 called Victim-1's father on or about November 15, 2023 at approximately 10:35pm—while Victim-1 was being transported to the Massachusetts location—to tell him that he had been kidnapped and to request that his father pay a ransom of \$30,000.

d. Victim-1 was released from the Massachusetts location on or about November 17, 2023 between approximately 12:00am and 2:00am. Victim-1 then drove back to Paterson, New Jersey, arriving during the early morning on or about that date.

11. During Victim-1's interview with law enforcement, law enforcement showed Victim-1 a photo array containing six photos. The array contained a photograph that law enforcement obtained of GARCIA and five "fillers" selected to

appear similar to GARCIA. Victim-1 positively identified the photo of GARCIA from the photo array as Individual-1.