

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-mj-6403-PAB

CHRISTOPHER JOVUN DOWNING
_____ /

FILED BY SM D.C.

Jun 17, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? NO
2. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? NO
3. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? NO
4. Did this matter involve the participation of or consultation now Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? NO

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

FILED BY SM D.C.**Jun 17, 2025**ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

United States of America)

v.)

CHRISTOPHER JOVUN DOWNING)

Case No.

25-mj-6403-PAB

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 17, 2025 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S. Code § 922(g)(1)

Possession of a firearm by a convicted felon

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

JUSTIN HERZLICH, S/A ATF

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by FaceTimeDate: June 17, 2025

Judge's signature

City and state: Fort Lauderdale, Florida

Hon. Panayotta Augustin-Birch, U.S. Mag. Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Justin Herzlich, being duly sworn, state as follows:

1. I am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since approximately 2007. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am empowered by law to conduct investigations of, and make arrests for, firearms offenses enumerated in Title 18 of the United States Code, and narcotics offenses enumerated in Title 21 of the United States Code.

2. This affidavit is submitted in support of a criminal complaint which charges Christopher Jovun DOWNING (“DOWNING”) with violations of Title 18, United States Code, Sections 922(g)(1) (Felon in possession of a firearm).

3. This Affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts and information contained in this Affidavit are based on my personal knowledge and observation, as well as information received in my official capacity from other individuals, including other law enforcement officers involved in this investigation, as well as my review of records, documents, and other physical items obtained during the course of this investigation. This Affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

PROBABLE CAUSE

4. On or about June 10, 2025, a Federal Search Warrant was authorized by United States Magistrate Judge Alicia O. Valle to search a residence located at 1060 NW 25th Way, Fort Lauderdale, Broward County, Florida (“TARGET RESIDENCE”).

5. The TARGET RESIDENCE is a blue, one-story residence with a white wooden front entry door. The front of the residence faces west and is located on the east side of NW 25th Way. The residence has a front covered entry with a driveway located to the west of the front entry door. Antonio Williams (“Williams”) is the listed property owner.



6. On June 17, 2025, Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF) Agents and Fort Lauderdale Police Department Drug Enforcement and Vice Unit (DEV) executed the search warrant of the TARGET RESIDENCE. Inside the TARGET RESIDENCE, agents observed multiple bedrooms, including a bedroom located in the northeast corner of the residence. Once inside the residence, law enforcement encountered DOWNING, who was taken into custody outside of his bedroom, located in the northeast corner, without incident. DOWNING is Williams’ roommate and DOWNING’s bedroom is separate and apart from Williams’ bedroom.

7. Inside the bedroom located in the northeast corner of the residence, where DOWNING was standing outside of, law enforcement officers located a Smith and Wesson pistol

gun box. The gun box had a serial number of JRP8859. Along with the gun box, twenty-three (23) rounds of G.F.L 9 mm caliber ammunition, empty magazines, and firearms accessories were recovered. In the same bedroom, within the top drawer of a dresser, a Smith and Wesson, model M&P 9 Shield, 9 mm caliber pistol, bearing the same serial number on the gun box, JRP8859, was recovered. The Smith and Wesson pistol was loaded with twelve (12) rounds of CBC 9mm Luger ammunition. Located near the firearm was a social security card, number ending in 5351, belonging to DOWNING. Also located on a nightstand, adjacent to the firearm, was a State of Florida driver's license in the name of DOWNING, as well as DOWNING's cellular phone.



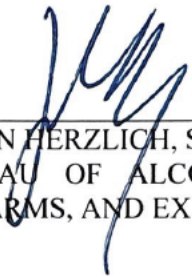
8. The firearm seized was a Smith and Wesson, model M&P 9 Shield, 9 mm caliber pistol, bearing serial number JRP8859, as well as a total of thirty-five (35) rounds of 9 mm caliber ammunition. The firearm and ammunition were manufactured outside of the state of Florida.

9. A review of DOWNING's criminal history shows the following felony convictions in Broward County, Florida: (a) Possession of a Firearm by a Convicted Felon, in violation of Florida Statute 790.23(1)(A) in Case No. 17-002195-CF10A, and (b) Possession of Cocaine, in

violation of Florida Statute 893.0.(2)(A)4, in Case No. 06-016826-CF10A. Based on DOWNING's felony conviction for the charge of Possession of a Firearm by a Convicted Felon in 2017, DOWNING knew he was a convicted felon.

10. This affidavit is made to show probable cause that Christopher Jovun DOWNING, violated Title 18, United States Code, Sections 922(g)(1) (Felon in possession of a firearm).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



JUSTIN HERZLICH, SPECIAL AGENT
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS, AND EXPLOSIVES

Attested to by the applicant in accordance with
the requirements of Fed. R. Crim. P. 4.1 by
telephone on this 17th day of June, 2025.



HONORABLE PANAYOTTA AUGUSTIN-BIRCH
UNITED STATES MAGISTRATE JUDGE