

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ORIGINAL FILED

JAN - 8 2013

PATTY SHWARTZ  
U.S. MAG. JUDGE

UNITED STATES OF AMERICA

: Mag. No. 13-3005

v.

: Hon. Patty Shwartz

ANTONIO MOORE

and CHARLES MADISON

: SEALED CRIMINAL COMPLAINT

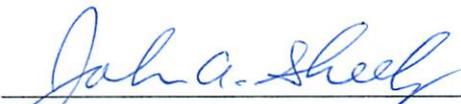
I, John Sheehy, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigations and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
John Sheehy, Special Agent  
Federal Bureau of Investigations

Sworn to before me and subscribed in my presence,  
on January 8, 2013, at Newark, New Jersey



HONORABLE PATTY SHWARTZ  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**COUNT ONE**  
**(Hobbs Act Robbery)**

On or about August 6, 2012, in Essex County, in the District of New Jersey, and elsewhere, defendants

ANTONIO MOORE  
and  
CHARLES MADISON

did knowingly and willfully conspire and agree with one another and others to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and to commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

**COUNT TWO**

**(Use of Firearm in Furtherance of Crime of Violence)**

On or about August 6, 2012, in Essex County, in the District of New Jersey, and elsewhere, defendants

ANTONIO MOORE  
and  
CHARLES MADISON,

during and in relation to a crime of violence for which each defendant may be prosecuted in a court of the United States, specifically the Hobbs Act robbery set forth in Count One, did knowingly and willfully use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

## ATTACHMENT B

I, John Sheehy, am a Special Agent with the Federal Bureau of Investigations. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. 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 August 6, 2012, defendants CHARLES MADISON and ANTONIO MOORE entered into an agreement with each other and with a co-conspirator ("CC-1") to rob the Golden Palace jewelry store ("Golden Palace") in Orange, New Jersey. MADISON agreed to provide the firearms and the getaway vehicle, while MOORE and CC-1 agreed to enter the Golden Palace and rob the store's employees at gunpoint.

2. In the early evening on or about August 6, 2012, MOORE and CC-1 entered the Golden Palace. Once inside the store, they each pulled stockings over their faces and drew weapons. MOORE was carrying a black pistol; CC-1 was carrying a silver handgun.

3. Two Golden Palace employees were working at the time of the robbery. After drawing their weapons, MOORE and CC-1 demanded that the employees empty the cash register and fill a black plastic bag with jewelry from the display counters. At one point, MOORE approached one of the employees, a twenty-one-year-old man, and told him to empty his pockets. The employee gave MOORE the approximately forty dollars in his pants pockets.

4. As the robbery continued, MOORE stated that the employees were taking too long to hand over the store's jewelry. MOORE then walked over to the other employee, a twenty-two-year-old female, and punched her in the head. The female employee fell backward, hitting the wall and then dropping to the ground. MOORE wrapped the female employee's wrists and ankles with duct tape, then returned to the male employee and tied his arms and legs together with telephone cord. MOORE and CC-1 grabbed additional plastic bags from inside the store and continued filling them with jewelry.

5. After filling the bags, MOORE and CC-1 left the store with their plastic bags, ran around the corner, and jumped into a white Ford F-150 pick-up truck driven by MADISON. The car sped off. Approximately one hour later, New Jersey State Troopers pulled over the truck near the intersection of South Orange Avenue and Speedway Avenue in Newark, New Jersey. At the time of the traffic stop, MADISON was driving, and MOORE and CC-1 were passengers. The State Troopers found dozens of pieces of gold jewelry scattered across the back seat of the

car, along with two pairs of stockings and a pair of work gloves. Underneath the vehicle, tucked into the spare tire wheel well, State Troopers retrieved the two firearms – a black 9mm semi-automatic Ruger handgun with a large-capacity magazine and a silver .357 Ruger pistol with a defaced serial number – that matched the descriptions of the guns used during the robbery. Both weapons were loaded.

6. After the incident, the owner of the Golden Palace took an inventory of his store and determined that MADISON, MOORE, and CC-1 took approximately \$120,000 in merchandise from the Golden Palace during the robbery.