

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No.
 :
 ANTONIO MOORE : 18 U.S.C. §§ 1951(a),
 and CHARLES MADISON : 924(c)(i)(A)(ii) & 2

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE

(Hobbs Act Robbery)

1. At all times material to this Indictment, Golden Palace was a commercial establishment located at 260 Main Street in Orange, Essex County, New Jersey, engaged in the sale of jewelry and other merchandise that moved in and affected interstate commerce.

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

ANTONIO MOORE, and
CHARLES MADISON,

did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendants did unlawfully take and obtain personal property consisting of United States currency and jewelry from the

persons of and in the presence of employees of the Golden Palace, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

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

COUNT TWO

(Use of a Firearm During a Crime of Violence)

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

ANTONIO MOORE, and
CHARLES MADISON,

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery, contrary to Title 18, United States Code, Sections 1951(a) and 2, as charged in Count One of this Indictment, did knowingly use, carry, and brandish a loaded firearm.

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

FORFEITURE ALLEGATION

1. The allegations contained in Count Two of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c), set forth in Count Two of this Indictment, the defendants

ANTONIO MOORE, and
CHARLES MADISON

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of that offense, including:

- a. One .357 Magnum Caliber Revolver, Sturm Ruger, Security Six Model, with a defaced serial number;
- b. Five unfired .357 Magnum Caliber cartridges with "R-P" headstamps;
- c. One 9mm caliber semi-automatic pistol, Sturm Ruger SR9C, with serial number 332-63213 and a large capacity magazine; and
- d. Seventeen unfired 9mm Full Metal Jacket cartridges with "LY9x1993" headstamps.

All pursuant to Title 18, United States Code, Section
924(d) (1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

ANTONIO MOORE &
CHARLES MADISON

INDICTMENT FOR

18 U.S.C. §§ 1951(a),
924(c)(i)(A)(ii) & 2

A True Bill,

Foreperson

PAUL J. FISHMAN

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