
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Cathy Waldor
v. : Mag. No. 12-7091
Clifton MOSLEY : CRIMINAL COMPLAINT

I, Jason J. Carley, 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 page and made a part hereof.



JASON J. CARLEY
Special Agent
Federal Bureau of Investigation

Sworn to before me and
subscribed in my presence,

March 7, 2012 at Newark, New Jersey

HONORABLE CATHY WALDOR
U.S. MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count 1

CLIFTON MOSLEY

On or about February 11, 2012, in Essex County, in the District of New Jersey, and elsewhere, did knowingly, by force and violence, and by intimidation, take and attempt to take from the person and presence of others, namely, employees of the TD Bank, located in Newark, New Jersey, approximately \$2,469 in money belonging to, and in the care, custody, control, management, and possession of TD Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

Count 2

CLIFTON MOSLEY

On or about February 17, 2012, in Essex County, in the District of New Jersey, and elsewhere, did knowingly, by force and violence, and by intimidation, take and attempt to take from the person and presence of others, namely, employees of the TD Bank, located in Newark, New Jersey, approximately \$590 in money belonging to, and in the care, custody, control, management, and possession of TD Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

Count 3

CLIFTON MOSLEY

On or about February 23, 2012, in Essex County, in the District of New Jersey, and elsewhere, did knowingly, by force and violence, and by intimidation, did attempt to take from the person and presence of others, namely, employees of the TD Bank, located in Newark, New Jersey, money belonging to, and in the care, custody, control, management, and possession of PNC Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

ATTACHMENT B

I, Jason Carley, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Since this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. 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 February 11, 2012, at approximately 11:30 a.m., an individual subsequently identified through investigation as Clifton MOSLEY, entered the TD Bank located at 1180 Raymond Boulevard in Newark, New Jersey, while wearing blue jeans, a winter coat with fur lined hood and black cap. Defendant MOSLEY handed a bank teller a handwritten demand note that stated in sum and substance "Give me all you money or I will start shooting!!" As the teller removed the money from her drawer the defendant stated "don't give me the dye money." Defendant MOSLEY then folded the money and placed it in his pocket. He left the bank with approximately \$2,469. The bank's video surveillance camera recorded the entire incident and reveal clear images of defendant MOSLEY.

2. On or about February 17, 2012, at approximately 1 p.m., an individual subsequently identified through investigation as Clifton MOSLEY, entered the TD Bank located at 105-109 Mulberry Street in Newark, New Jersey, while wearing a beige jacket and black cap. Defendant MOSLEY handed a bank teller a handwritten demand note that stated in sum and substance "hand over the money or I start shooting." During the course of the encounter, defendant MOSLEY exposed what appeared to be a green tri-fold wallet and blue flip-phone. The teller handed approximately \$590 and a dye pack to defendant MOSLEY, who fled the location. Canvassing the area, officers located a damaged red ink dye pack along with ink stained currency at 217 Market St. The bank's video surveillance camera recorded the entire incident and reveal clear images of defendant MOSLEY.

3. On or about February 23, 2012, at approximately 5:44 p.m., an individual subsequently identified through investigation as Clifton MOSLEY, entered the PNC bank located at 565 Main Street in East Orange, New Jersey, while wearing a black knit cap, down vest, dark colored long sleeved short/sweatshirt and white pants. Defendant MOSLEY handed a bank teller a handwritten demand note that stated in sum and substance "Put money in window NOW! No Alarm or Die Pack or We Start Shooting 5 Seconds!" The teller walked away from teller window number one towards teller window number five. When the teller turned back around, defendant MOSLEY was gone. The bank's video surveillance camera recorded the entire incident and reveal clear images of defendant MOSLEY.

4. Subsequent investigation into the three bank robberies developed defendant MOSLEY as a possible suspect. Utilizing several information databases, law enforcement developed several possible addresses for defendant MOSLEY.

5. On February 29, 2012, at approximately 6:00 a.m., law enforcement spoke to a former friend/girlfriend of defendant MOSLEY, who informed them that MOSLEY frequently stayed at her home. After she signed a consent to search, law enforcement recovered two jackets immediately recognizable as used in the February 11, 2012 (black jacket with distinct red patch on the right sleeve) and February 17, 2012 (tan jacket with fur lined collar and cuffs) robberies. The right sleeve cuff of the tan jacket used in the February 17, 2012 robbery was stained with red dye similar to the dye contained in the dye pack placed in money turned over to MOSLEY by the TD Bank teller. A black knit cap was found in the pocket of the black jacket. MOSLEY was not present at this location.

6. On February 29, 2012, at approximately 8:00 a.m., law enforcement arrested MOSLEY after locating his whereabouts. When arrested, defendant MOSLEY was wearing a down vest jacket and grey sweatshirt type jacket, immediately recognizable as being worn during the attempted February 23, 2012, bank robbery. Defendant MOSLEY was also in possession of a black knit cap bearing a white "NY" patch type symbol, immediately recognizable as being worn by him during the February 17, 2012 and February 23, 2012 bank robberies.

7. Defendant MOSLEY was also found in possession of a blue flip-type cellular telephone, also recognizable as present in both the February 17, 2012 and February 23, 2012 bank robberies.

8. As of this date, defendant MOSLEY's photograph was placed in a photo display and shown to a bank teller at the February 11, 2012 TD Bank robbery and February 17, 2012 TD Bank robbery. Both tellers selected defendant MOSLEY's photograph as the person perpetrating the robberies.

9. At all times relevant to this Complaint, the deposits of all three banks were insured by the Federal Deposit Insurance Corporation.