
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Hon. Mark Falk

v.

: Mag. No. 13-3639

COREY THERMITUS and
JAMIE MANNING

: SUPERSEDING COMPLAINT

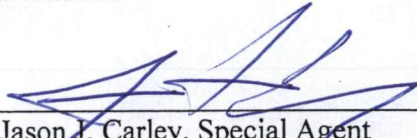
I, Jason J. Carley, being duly sworn state the following is true and correct to the best of my knowledge and belief:

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:

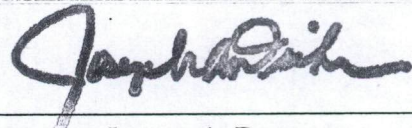
SEE ATTACHMENT B

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,
on December 19, 2013, at Newark, New Jersey



HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One (Conspiracy to Commit Theft of a Motor Vehicle by Force, Violence and by Intimidation and to Use a Firearm During a Crime of Violence)

From on or about December 26, 2012 through on or about December 29, 2012, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY THERMITUS
and
JAMIE MANNING,

did knowingly and intentionally conspire and agree with each other and others to commit offenses against the United States, namely, to take from the person and presence of another, by force and violence and by intimidation, with intent to cause death and serious bodily harm, motor vehicles that had been transported, shipped, and received in interstate and foreign commerce, contrary to Title 18, United States Code, Section 2119, and to knowingly use and carry a firearm during and in relation to such crimes, and to possess a firearm in furtherance of such crimes, which said firearms were brandished and discharged, contrary to Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (iii).

In furtherance of the conspiracy and to effect its unlawful objects, defendants COREY THERMITUS and JAMIE MANNING, and their co-conspirators committed the overt acts, among others, in the District of New Jersey and elsewhere, as set forth in Attachment B below.

In violation of Title 18, United States Code, Section 371.

Count Two (Theft of a Motor Vehicle by Force, Violence and by Intimidation)

On or about December 26, 2012, in Essex County, in the District of New Jersey and elsewhere, defendants

COREY THERMITUS
and
JAMIE MANNING,

with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a grey, 2002, four-door, grey Nissan Altima, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely VICTIM ONE and VICTIM TWO, by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

Count Three (Brandishing a Firearm in Furtherance of a Crime of Violence)

On or about December 26, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

JAMIE MANNING,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, specifically the carjacking set forth in Count Two, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which firearm was brandished.

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

Count Four (Theft of a Motor Vehicle by Force, Violence and by Intimidation)

On or about December 28, 2012, in Essex County, in the District of New Jersey and elsewhere, defendants

COREY THERMITUS

and

JAMIE MANNING,

with the intent to cause death and serious bodily harm, knowingly took a motor vehicle, namely a grey, 2011, four-door Honda Accord, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely VICTIM THREE, by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

Count Five (Attempted Theft of a Motor Vehicle by Force, Violence and by Intimidation)

On or about December 28, 2012, in Essex County, in the District of New Jersey and elsewhere, defendants

COREY THERMITUS

and

JAMIE MANNING,

with the intent to cause death and serious bodily harm, intentionally attempted to take a motor vehicle, namely a red, 2006, four-door Nissan Pathfinder, that had been transported, shipped and received in interstate and foreign commerce from the person and presence of another, namely VICTIM FOUR, by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119 and Section 2.

Count Six (Discharging a Firearm in Furtherance of a Crime of Violence)

On or about December 28, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

COREY THERMITUS,

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, specifically the attempted carjacking set forth in Count Five, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which firearm was discharged.

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

ATTACHMENT B

I, Jason J. Carley, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon my investigation and discussions with other law enforcement personnel and others, and my review of reports, documents and items of evidence. 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. At approximately 4:30 a.m. on or about December 26, 2012, VICTIM ONE and VICTIM TWO walked toward and entered a 2002, grey, four-door, Nissan Altima (the "Grey Altima"), which was parked on a street in Newark. At that time, VICTIM ONE was placing a bag in the rear, passenger seat on the driver's side of the Grey Altima, while VICTIM TWO was entering the front passenger's seat. Moments later, a man, later identified as defendant JAMIE MANNING, approached VICTIM ONE on the driver's side and pointed a gun at VICTIM ONE. A man, later identified as defendant COREY THERMITUS, approached VICTIM TWO on the passenger side of the vehicle and pulled on the car door and demanded that VICTIM TWO exit the vehicle.

2. VICTIM TWO resisted, and in response, defendant COREY THERMITUS told defendant JAMIE MANNING to shoot VICTIM ONE. VICTIM TWO stopped resisting and exited the vehicle and defendant COREY THERMITUS told VICTIM TWO to leave VICTIM TWO's bag in the car. VICTIM TWO complied. Simultaneously, defendant JAMIE MANNING searched VICTIM ONE and took his/her belongings. Defendant JAMIE MANNING directed VICTIM ONE to step away from the car. As defendant JAMIE MANNING and defendant COREY THERMITUS entered the Grey Altima, defendant JAMIE MANNING told VICTIM ONE and VICTIM TWO, in sum and substance, not to call the police because he knows where they live. Thereafter, defendants COREY THERMITUS and JAMIE MANNING fled the scene in the Grey Altima.

3. At approximately 10:40 p.m. on or about December 28, 2012, VICTIM THREE was sitting in his/her dark grey, 2011, four-door Honda Accord (the "Grey Accord"), in the driveway of a home in Newark. At the time, VICTIM THREE had the keys in the ignition of the Grey Accord and the vehicle's doors were unlocked. Shortly thereafter, a man, later identified as defendant COREY THERMITUS, approached the Grey Accord, opened the door and put a gun to VICTIM THREE's head. Defendant COREY THERMITUS ordered VICTIM THREE out of the car, and threatened to shoot VICTIM THREE if VICTIM THREE did not comply with his demands. Defendant COREY THERMITUS further ordered VICTIM THREE to drop his/her cellular telephone and to sit on the ground beside the Grey Accord.

4. VICTIM THREE dropped his/her cellular telephone, exited the Grey Accord and sat down on the ground next to the Grey Accord as ordered. At that time, defendant COREY THERMITUS got into the driver's seat of the Grey Accord, and defendant JAMIE

MANNING and a third man got into the Grey Accord on the passenger's side. The men drove away in the Grey Accord.

5. Later that night, at or around 11:50 p.m., VICTIM FOUR traveled in a red, 2006, four-door Nissan Pathfinder (the "Red Pathfinder") to a residence in Newark. At or around the same time, defendant COREY THERMITUS, defendant JAMIE MANNING, and a third man parked the Grey Accord and exited the vehicle. After VICTIM FOUR backed into the driveway of the residence, defendant COREY THERMITUS approached the driver's side of the Red Pathfinder and opened the front door while pointing a firearm at VICTIM FOUR and ordering VICTIM FOUR out of the vehicle. Defendant JAMIE MANNING walked to the rear passenger's side of the Red Pathfinder where VICTIM FOUR's young child was seated. The third man stood at the end of the driveway and served as a "lookout."

6. Once defendants COREY THERMITUS and JAMIE MANNING approached the Red Pathfinder, the third man ran back to the Grey Accord and drove it in front of the driveway of the residence. VICTIM FOUR began to beep the horn of the Red Pathfinder, screamed, closed the driver's side door and began to drive out of the driveway. Because the Grey Accord was partially blocking the driveway, VICTIM FOUR drove the Red Pathfinder across the front lawn of the residence. The third man drove away in the Grey Accord, leaving defendants COREY THERMITUS and JAMIE MANNING in the driveway.

7. Moments later, the third man drove the Grey Accord back to the residence. Defendants COREY THERMITUS and JAMIE MANNING then got into the Grey Accord. At that time, an individual, WITNESS ONE, came out of a residence to look for VICTIM FOUR. By then, VICTIM FOUR had returned to the area of the residence in the Red Pathfinder, and attempted to block the Grey Accord as it was making a U-turn. Defendant COREY THERMITUS, who was seated in the rear driver's seat of the Grey Accord, reached out of the vehicle and discharged his firearm in the direction of WITNESS ONE. The three men then fled the area in the Grey Accord.

8. The attempted carjacking was captured on surveillance videos.

9. At or around 12:51 a.m. on December 29, 2012, Newark police officers encountered the Grey Accord on the corner of Morris and Springfield Avenues in Newark. Upon seeing the police officers, the driver of the Grey Accord rammed into a marked police vehicle and then reversed the Grey Accord and rammed it into the vehicle behind it. Once the Grey Accord came to a stop, defendant COREY THERMITUS, who was seated in the rear driver's seat, ran out of the vehicle; defendant JAMIE MANNING, who was seated in the front passenger seat, and the other man, who was seated in the front driver's seat, ran, as well. After a brief foot chase, Newark police officers apprehended defendant COREY THERMITUS, while defendant JAMIE MANNING and the third man escaped on foot. Defendant COREY THERMITUS was holding a black handgun at the time officers apprehended him. The firearm in defendant COREY THERMITUS' possession at the time of his arrest was a black Kel-Tec 9 millimeter handgun loaded with five rounds of ammunition.

10. Both defendants COREY THERMITUS and JAMIE MANNING and the third man are captured on surveillance videos fleeing the Grey Accord, after it crashed.

11. The Grey Altima, the Grey Accord and the Red Pathfinder were all manufactured outside of the state of New Jersey.