

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF MISSOURI

United States of America
v.

CHARLES JOHNSON,
and SHAYNE KIER JONES,

Case No. 4:16 MJ 6062 PLC

Defendant(s)

CRIMINAL COMPLAINT

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 April 4, 2016 in the county of St. Louis City in the
Eastern District of Missouri, the defendant(s) violated:

Code Section

Offense Description

18:1951 and 2

Conspiracy to interfere with commerce by threats of violence.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Complainant's signature

Special Agent Mike Christian, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/15/2016

Judge's signature

City and state: St. Louis, Missouri

Honorable Patricia L. Cohen, United States Magistrate Judge

Printed name and title

## AFFIDAVIT

At all times material to this Complaint, Dunbar Armored Inc. was engaged in the transport of currency, commercial paper, and other materials in interstate commerce and in an industry affecting interstate commerce including a transport of currency from Bank of America St. Louis, Missouri.

On April 4, 2016, in the Eastern District of Missouri, CHARLES JOHNSON and SHAYNE KIER JONES and another known to law enforcement, did unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, in that CHARLES JOHNSON (JOHNSON) and SHAYNE KIER JONES (JONES) and another, did unlawfully take and obtain property in the form of United States currency from Dunbar Armored Co. shortly after a money pickup from the Parking Division of the City of St. Louis and GARDA Armored, said currency being taken from the person of a Dunbar Armored Inc. employee, against his will and by means of actual force, violence and injury in that one or more of the robbers threatened the use of a firearm.

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

On April 4, 2016, JONES was employed by Dunbar and his duty was to exit the armored truck to do the pickup and delivery of US currency. A second employee (CT) was assigned as the driver. At the end of the day's route (CT) was told by JONES that he JONES would drive the armored truck back to Dunbar. JONES then decided to exit the highway to gas the truck. After getting gas, JONES acted like he was lost and stopped the truck at Antelope and Switzer in the City of St. Louis, within the Eastern District of Missouri. He exited the truck and two individuals brandishing firearms rushed him and demanded the money in the truck. As threats of violence were being made, JONES began to throw the money bags out the back door to JOHNSON and JB. CT said that there was a white Buick vehicle right next to the armored car. CT and JONES then drove the truck from the scene of the armed robbery.

Both CT and JONES were interviewed as victims by law enforcement that night. On April 7<sup>th</sup>, JONES was interviewed by employees of Dunbar again denying any involvement in the robbery. He then changed his story and told them that he committed the robbery as he was threatened by unknown people.

On April 14<sup>th</sup>, the owner of the white vehicle, JB, which was used in the robbery was interviewed and finally admitted his involvement in the robbery. He told law enforcement that JOHNSON contacted him with the concept of the robbery. JOHNSON told JB that he had a cousin who worked for the armored truck company and was going to assist. JB's role was to be the driver of the getaway car, the white car. JOHNSON provided the Dunbar shirts used in the robbery, skull caps and sunglasses.

On April 4<sup>th</sup>, JB and JOHNSON drove to the site picked out for the robbery. JONES drove the armored truck to that location, exited the truck which allowed JB and JOHNSON to approach and demand money. JB did not know that JONES was the inside employee until he saw him outside the truck. JB realized that he had seen JONES as a customer at JB's work. JOHNSON also worked at that same place.

After the robbery, JB and JOHNSON drove the white car loaded with the stolen money to JB's residence where the money was transferred to another car. They then drove to JB's mother's house and divided the stolen money into three shares. As JONES was still being interviewed by law enforcement, JOHNSON took two shares of the stolen money and left.

**USDC-EDMO  
CRIMINAL CASE COVER SHEET**

**COMPLAINT**

<b>Division of Filing:</b>	<b>County of Offense:</b>	<b>Matter to be Sealed:</b>	<b>Type of Charge:</b>
Eastern	St. Louis City	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

**Defendant Information:**

Defendant's Name CHARLES JOHNSON  
 Alias Name \_\_\_\_\_  
 Birthdate \_\_\_\_\_ Not Available \_\_\_  
 Social Security No. \_\_\_\_\_ Not Available \_\_\_

**Related Case Information:**

Superseding Indictment/Information?  Yes  No *If yes, original case number:* \_\_\_\_\_  
 Is this a New Defendant in the Superseding Indictment/Information?  Yes  No  
 Prior Complaint?  Yes  No *If yes, Complaint No.* \_\_\_\_\_  
 Complaint:  Pending  Dismissed  
 Defendant has had an appearance before a Magistrate?  Yes  No *If yes, Magistrate name:* \_\_\_\_\_

**Victim-Witness Act applies:**

Yes  No  
 Name of AUSA: Thomas J. Mehan, #28958MO  
 Bond/Detention: Detention  Secured  Nonsecured  
 Agent/Agency: Mike Christian, FBI

**Interpreter Needed:**

Yes Language and/or dialect \_\_\_\_\_  
 No  
 Not known at this time

**Location Status:**

Arrest Date 04/14/2016  
 Currently in Federal Custody  
 Currently in State Custody -- Writ required  Yes  No  
 Currently on bond set by Court  
 Defendant not in custody

**U.S.C. Citations and Total # of Counts against this Defendant:** 1

Index Key/Code/Offense Level/AOcd/Sev	Description of Offense Charged	Count(s)	Penalty Information
18:1951 and 2	Conspiracy to interfere with commerce by threats of violence	1	I NMT 20 years F NMT 4250,000 <u>or both</u> Sup. Rel. 3 years \$ 100 Special Assess./count

**Date:** 4/15/2016

**Signature of AUSA** Thomas J. Mehan, #28958MO

**USDC-EDMO  
CRIMINAL CASE COVER SHEET**

**COMPLAINT**

<b>Division of Filing:</b>	<b>County of Offense:</b>	<b>Matter to be Sealed:</b>	<b>Type of Charge:</b>
Eastern	St. Louis City	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

**Defendant Information:**

Defendant's Name SHAYNE KIER JONES  
 Alias Name \_\_\_\_\_  
 Birthdate \_\_\_\_\_ Not Available   
 Social Security No. \_\_\_\_\_ Not Available

**Related Case Information:**

Superseding Indictment/Information?  Yes  No *If yes, original case number:* \_\_\_\_\_  
 Is this a New Defendant in the Superseding Indictment/Information?  Yes  No  
 Prior Complaint?  Yes  No *If yes, Complaint No.* \_\_\_\_\_  
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**Date:** 4/15/2016

**Signature of AUSA** \_\_\_\_\_  
 Thomas J. Mehan, #28958MO