

W.I. (5)

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Martin Tucker

Case: 2:12-mj-30441
Judge: Unassigned,
Filed: 07-16-2012 At 10:17 AM
USA v. Sealed Matter (MLW)(CMP)

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 July 16, 2009 in the county of Monroe in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. section 2113(a)
18 U.S.C. section 924(c)(1)

Offense Description
Bank Robbery
Using or Carrying a Firearm During and In Relation to a Crime of Violence

This criminal complaint is based on these facts:
See Attached Affidavit.

Continued on the attached sheet.

Robert G. Schmitz
[Signature]

Complainant's signature

Robert G. Schmitz, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/16/12

City and state: Detroit, Michigan

[Signature]

Judge's signature

Hon. Mona K. Maizoub

Printed name and title

AFFIDAVIT

Special Agent Robert G. Schmitz, Federal Bureau of Investigation (FBI), being duly sworn, deposes and states the following:

1) Affiant is a Special Agent (SA) of the FBI, and has been so employed for twenty-three (23) years. In his current capacity, affiant is assigned to the Detroit Field Office, at the Ann Arbor, Michigan Resident Agency. Affiant investigates a wide variety of Federal crimes, to include violent crimes, such as bank robbery.

2) As a Federal Agent, affiant is authorized to investigate violations of the laws of the United States, and to execute warrants issued under the authority of the United States.

3) The information in this affidavit is based upon personal investigation, and upon investigation that has been conducted by other law enforcement officers and provided to affiant during this investigation.

4) On July 16, 2009, at approximately 9:33 AM, the Monroe County Community Credit Union, 7408 Lewis Avenue, Temperance, Michigan, was robbed at gunpoint. Two individuals entered the credit union, and pointed semi-automatic weapons at the credit union employees and lone customer. One of the individuals pushed a customer and shouted to an employee, "Hurry up - give me all the money in the drawer." The two individuals in the credit union were wearing hooded sweatshirt and gloves, and each individual brandished a semi-automatic weapon. One of the gunmen wore a black mask that covered his entire face. The other gunman wore a camouflage patterned mask with large openings around the eyes. From the openings, it appears that the gunman has light-colored skin. They escaped into an awaiting

getaway vehicle that was driven by a third individual. An audit revealed that the robbers escaped with \$5,379.00 in Federally-insured United States currency.

5) A witness outside the credit union observed the robbery in progress, and followed the three individuals in his personal car. The three robbers abandoned their vehicle approximately three miles from the credit union, after crossing into Ohio, abandoning the getaway vehicle in the driveway of a private home located in Toledo, Ohio. The three individuals ran into a wooded area adjacent to that home.

8) Within minutes, deputies from the Monroe County Sheriff's Office (MCSO) responded to the location of the abandoned getaway car and observed a path of items including latex gloves, a Footlocker t-shirt, a black mask (that appears from surveillance photos to be worn by one of the gunmen) and industrial gloves, leading to the woods. These discarded items as well as a swab of the getaway vehicle's steering wheel were collected and preserved as evidence and turned over to the FBI for submission to the FBI Laboratory for appropriate analysis.

9) The FBI Laboratory examined the Footlocker T-shirt and developed a DNA profile. After developing the DNA profile, the FBI Combined DNA Index System (CODIS) was searched, and a computer match was made on a convicted offender DNA profile previously submitted by the Ohio Bureau of Criminal Identification and Investigation. The match with the convicted offender profile has been identified as identical to Quentin A. Sherer, with a date of birth of August 31, 1979. Sherer's physical characteristics are consistent with victims' descriptions of the gunman that wore the black mask during the robbery of the Monroe County Community Credit Union.

11) As a result, **Quentin Sherer** was arrested and indicted in November 2011. His case is currently pending before Judge Robert H. Cleland. After his indictment, Sherer's DNA was obtained with a buccal swab and a second DNA analysis was conducted. That analysis showed that Sherer's DNA matched an industrial glove, the t-shirt, and the black mask. The DNA analysis, however, also showed the presence of other, unidentified DNA profiles on several of the items collected near the abandoned getaway car, including the black mask.

12) Further investigation led to identifying associates of Sherer, and eventually an individual by the name of **Martin Tucker** was identified. Based on your affiant's observations of photographs and videos of **Tucker**, he appears to be a light-skinned, mixed race, black male with a date of birth of 09/22/1979. Your Affiant searched public social networks and found that Martin Tucker and Quentin Sherer were friends. In a Myspace internet search, your Affiant observed a photograph of **Martin Tucker** and Quentin Sherer together in a photograph.

12) Your Affiant learned that **Tucker** is a boxer and on April 28, 2012, **Tucker** was featured in a boxing match in Toledo, Ohio. During the match, **Tucker** sustained a bloody nose, and your Affiant was able to obtain a discarded Q-Tip swab that contained Tucker's blood. This Q-Tip swab was submitted to the FBI Laboratory to develop a DNA reference profile for **Tucker**.

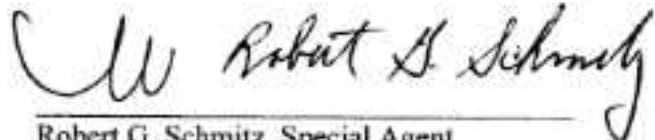
13) After a quality control review process, the FBI Laboratory drafted a report dated June 12, 2012. The FBI Laboratory determined that the DNA profile of **Martin Tucker** matched one of the DNA profiles extracted from the black mask¹ and was also a match to the DNA swab collected from the steering wheel of the getaway vehicle. Investigation also determined that the getaway car was stolen from its owner's driveway in Toledo, Ohio, sometime during early

¹ A DNA analysis performed using a buccal sample obtained from Sherer subsequent to his indictment confirmed a match between one of the other DNA profiles extracted from the mask.

morning hours before the Credit Union was robbed.

14) Your affiant has reviewed surveillance photographs of the Monroe Community Credit Union Robbery. **Martin Tucker's** physical characteristics are consistent with the camouflage masked gunman that was brandishing a handgun in his right hand. The gunman's eyebrow, and eye area were also visible thru the mask worn by the robber. **Tucker's** known complexion is consistent with the complexion of the gunman.

15) Based on the foregoing, there is probable cause to believe that **Martin Tucker**, is one of the individuals who robbed the Federally-insured Monroe County Community Credit Union, 7408 Lewis Avenue, Temperance, Michigan, on July 16, 2009, through force and intimidation, in violation of Title 18, United States Code (USC), § 2113(a). Further, there is probable cause to believe that **Martin Tucker** used, carried and possessed, and aided and abetted others in using, carrying and possessing, a firearm during and in relation to the Monroe County Community Credit Union robbery, in violation of Title 18, USC, § 924(c)(1).



Robert G. Schmitz, Special Agent
Federal Bureau of Investigation

Sworn to before me, and subscribed
in my presence, this 16th day of July, 2012



Honorable Mona K. Majzoub
U.S. Magistrate Judge