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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag No. 13-4116  
v. : Hon. Michael A. Hammer  
PHILLIP JOHNSON : **CRIMINAL COMPLAINT**

I, Carlos Morales, 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:

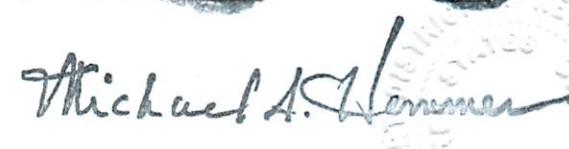
**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

  
Special Agent Carlos Morales  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
July 8, 2013 in Essex County, New Jersey

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer



**ATTACHMENT A**

**Count One - Heroin**

Between in and around August and September 2012, in Somerset County, in the District of New Jersey and elsewhere, defendant

PHILLIP JOHNSON

did knowingly and intentionally distribute, and possess with intent to distribute, quantities of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

**Count Two – Cocaine Base**

In and around September 2012, in Somerset County, in the District of New Jersey and elsewhere, defendant

PHILLIP JOHNSON

did knowingly and intentionally distribute, and possess with intent to distribute, a quantity of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

## ATTACHMENT B

I, Carlos Morales, am a Special Agent with the Federal Bureau of Investigation. 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. Because 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. The Veterans Health Administration, which is administered by the U.S. Department of Veterans Affairs ("VA"), is the largest integrated health care system in the United States. The VA administers over 1,700 health care sites serving over 8.3 million veterans every year. The VA Medical Center in Lyons, New Jersey, is part of the VA New Jersey Health Care System, which together with several community-based outpatient clinics throughout the State of New Jersey, endeavors to honor America's servicemen and women by providing exceptional health care to the veteran community.

2. PHILLIP JOHNSON is a veteran. As a veteran, PHILIP JOHNSON had access to the buildings and grounds of the VA Medical Center, as well as other veterans receiving treatment and attending programs at the VA Medical Center

3. PHILLIP JOHNSON took advantage of his status as a veteran by selling heroin and cocaine base, or "crack cocaine," to another veteran while on the property of the VA Medical Center in Lyons.

4. Specifically, in August 2012, while a resident at the VA Medical Center in Lyons, PHILLIP JOHNSON sold a quantity of heroin to another veteran at the VA Medical Center in Lyons, New Jersey.

5. In September 2012, PHILLIP JOHNSON again sold quantities of heroin on two occasions to another veteran at the VA Medical Center in Lyons.

6. Also in September 2012, PHILLIP JOHNSON sold a quantity of cocaine base, or "crack cocaine," to another veteran at the VA Medical Center in Lyons.