
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Mag No. 13-4118
v. : Hon. Michael A. Hammer
THOMAS PEARSON : **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

Between in and around October and December 2012, in Somerset and Essex Counties, in the District of New Jersey and elsewhere, defendant

THOMAS PEARSON

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.

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 Centers in East Orange and Lyons, New Jersey (the "VA Medical Centers") are part of the VA New Jersey Health Care System, which together with several community-based outpatient clinics throughout the State of New Jersey, endeavor to honor America's servicemen and women by providing exceptional health care to the veteran community.

2. The VA Medical Centers provide a wide range of rehabilitation and treatment services to veterans.

3. The VA Medical Centers also administer a vocational rehabilitation program, known as Compensated Work Therapy ("CWT"), which matches work-ready veterans with competitive jobs, and provides support to the veterans after placement. CWT programs strive to maintain long-term quality relationships with business and industry in order to promote employment opportunities for veterans with physical and mental disabilities.

4. THOMAS PEARSON is a veteran, and was employed as a housekeeper through the CWT program at the VA Medical Center in Lyons. As a veteran and CWT employee, THOMAS PEARSON had access to the buildings and grounds of the VA Medical Centers, as well as to veterans receiving treatment and attending programs at the VA Medical Centers.

5. THOMAS PEARSON took advantage of his status as a veteran and as a CWT employee by selling narcotics on multiple occasions to another veteran while on the property of the VA Medical Centers.

6. Specifically, in October 2012, THOMAS PEARSON sold a quantity of heroin to a veteran at the VA Medical Center in Lyons.

7. In November 2012, THOMAS PEARSON again sold a quantity of heroin to a veteran at the VA Medical Center in Lyons.

8. In December 2012, THOMAS PEARSON sold a quantity of heroin to a veteran at the VA Medical Center in East Orange.