
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark
:
v. :
: Mag. No. 16-3106 (JBC)
JASON THOMPSON, :
a/k/a "Mega," and :
CLEMENTE R. CARLOS, :
a/k/a "Bease" : **SUPERSEDING CRIMINAL COMPLAINT**

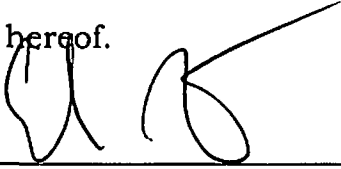
I, Elizabeth White, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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 pages and made a part hereof.



Special Agent Elizabeth White
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July 5, 2016, Essex County, New Jersey

HONORABLE JAMES B. CLARK
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Hobbs Act Robbery Conspiracy)

On or about August 12, 2015, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

JASON THOMPSON,
a/k/a "Mega," and
CLEMENTE R. CARLOS,
a/k/a "Bease,"

did knowingly and willfully conspire and agree with each other and others, known and unknown, to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and committed and threatened physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Sections 1951(a).

COUNT TWO

(Possession of a Firearm by a Convicted Felon)

On or about December 2, 2015, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

JASON THOMPSON,
a/k/a "Mega,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Passaic County, did knowingly possess, in and affecting commerce, a firearm, namely, a Rossi Revolver bearing serial W243606, in violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Elizabeth White, 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, recordings, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and 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. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause.

1. On or about August 12, 2015, around 7:00 a.m., two men wearing Passaic County Sherriff's uniforms and armed with handguns, accosted a female victim and her infant as the female was leaving her residence in Paterson, New Jersey. The two men, pretending to be members of the Sherriff's Office, led the female ("Victim 1") back into her apartment inside the residence (the "Apartment"). Once inside, one of the perpetrators, since identified as defendant JASON THOMPSON ("THOMPSON"), removed a firearm from a sidearm holster and pointed it at Victim 1's brother ("Victim 2"), who had been sleeping inside the apartment. THOMPSON then used a zip-tie to restrain Victim 2's hands behind his back and instructed Victim 2 to kneel on the floor.
2. The second perpetrator, since identified as defendant CLEMENTE R. CARLOS ("CARLOS"), was observed using a Bluetooth earpiece during the home invasion to speak to a third party.
3. THOMPSON and CARLOS did not take any property from the Apartment, but before leaving they broke open and searched a dresser inside the Apartment.
4. After leaving the Apartment, THOMPSON and CARLOS entered a van parked outside, which was driven by a third co-conspirator. Security camera footage from the exterior of the Apartment shows that the van contained what appeared to be a flashing police-type light inside it.
5. In a post-arrest, Mirandized statement to law enforcement made on or about December 2, 2015, THOMPSON admitted to committing the home invasion in Paterson on August 12, 2015, though he denied carrying a real gun during the incident. THOMPSON told law enforcement officers that he and his partner were looking for and intended to steal \$1 million of business proceeds from a distribution business that they believed was hidden inside a piece of furniture inside the Apartment.

6. Both Victim 1 and Victim 2 have identified CARLOS as taking part in the home invasion on or about August 12, 2015.
7. An analysis of historical cell site records for cell phones used by THOMPSON and CARLOS shows that on or about August 12, 2015, those cell phones were in close proximity to the Apartment around the time of the armed robbery.
8. Pursuant to a judicially-authorized search of THOMPSON's residence on or about December 2, 2015, law enforcement officers recovered a Rossi revolver bearing serial number W243606 (the "Revolver"), as well as multiple rounds of ammunition, inside THOMPSON's residence.
9. During his post-arrest statement to law enforcement officers on or about December 2, 2015, THOMPSON admitted to possessing the Revolver and the ammunition found inside his residence.
10. The Revolver was not manufactured in the State of New Jersey, and thus necessarily traveled through interstate commerce prior to being possessed by defendant THOMPSON. Additionally, a search of law enforcement databases revealed that the Revolver was previously stolen from a residence in Durham, North Carolina, further indicating that the Revolver necessarily traveled interstate before it was recovered in THOMPSON's possession on or about December 2, 2015.
11. THOMPSON is a convicted felon. Specifically, on or about May 6, 2005, THOMPSON was convicted in Superior Court in Passaic County, New Jersey, for possession of a controlled dangerous substance with intent to distribute within 1,000 feet of a school district, in violation of N.J.S.A 2C:35-7. This crime is punishable by a term of imprisonment exceeding one year.