

AFFIDAVIT

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3 Peter K. King, Special Agent, Federal Bureau of Investigation (“FBI”),
4 being duly sworn, states:

5 1. I have been a Special Agent of the FBI for over nineteen years and have
6 been assigned to the Boston office of the FBI since August of 1997. From 1982 through
7 1988, I served in the United States Army.

8 2. This affidavit is submitted in support of a criminal complaint charging
9 JAMES F. STOKES with forging, counterfeiting or falsely altering a certificate of
10 discharge from the military or naval service of the United States and using, unlawfully
11 possessing or exhibiting the certificate knowing the same to be forged, counterfeited or
12 falsely altered in violation of Title 18, United States Code, Section 498.

13 3. This affidavit is being submitted for the limited purpose of establishing
14 probable cause to believe that STOKES has committed a violation of 18 U.S.C. §498 and I
15 have not included each and every fact known to me concerning this investigation. The facts
16 are based on my personal participation in this investigation which included an interview of
17 STOKES and numerous other witnesses.

18 4. JAMES F. STOKES (YOB 1944) has a residence at 101 Boxford Street,
19 Apt.#1, Lawrence, MA, 01843.

20 5. STOKES’ fraudulent misuse of a certificate of discharge from the
21 military or naval service of the United States first came to the attention of the FBI in
22 December of 2007. On December 21, 2007, I spoke with the Veterans Services Director of
23 Lawrence, MA (Francis Urena), who advised me that STOKES had been recently elected to
24 the Lawrence School Committee. Urena advised me that STOKES had falsely represented
25 himself to be a military veteran during the course of his School Committee campaign. At
26 my request, Mr. Urena provided me with a copy of a document from the City of Lawrence’s
27 Department of Veteran Services purporting to be STOKES’ DD-214 military discharge
28 document which falsely indicated that he had been a United States Marine who had won

1 numerous awards including a Purple Heart Medal. A copy of that document is attached
2 hereto.

3 6. The National Personnel Records Center in St. Louis, MO, has indicated
4 that it was unsuccessful in identifying a military service record for JAMES F. STOKES.
5 The Naval Criminal Investigation Services in Newport, RI, has also indicated that it was
6 unable to identify a military service record for JAMES F. STOKES.

7 7. I have also spoken with Jorge Dejesus who has worked for the City of
8 Lawrence since 2002. From approximately July 2006 through February 2007, Dejesus
9 served as the Director of Veteran Services in Lawrence, MA. In early November of 2006,
10 STOKES appeared in his office and became defensive regarding questions about his
11 alleged veteran status. Several days later, STOKES appeared again at the Department of
12 Veteran Services and provided Dejesus with a document known as a DD-214 form
13 (attached hereto), which is a certificate of discharge from the military or naval service of
14 the United States. As noted above, this document falsely indicated that STOKES had been
15 a United States Marine who had won numerous awards including a Purple Heart Medal.

16 8. On January 4, 2008, I interviewed STOKES at his place of residence in
17 Lawrence, MA. STOKES admitted that he was never a United States Marine and that he
18 had never served in the military or naval service of the United States. STOKES was shown
19 the DD-214 form referenced above (and attached hereto) and he admitted that it was not
20 accurate. He also admitted that he had signed the phony document and claimed that he did
21 so after it was created by his now deceased brother.

22 9. Based on the information set out above, I believe probable cause exists
23 to conclude that in November 2006, JAMES F. STOKES forged, counterfeited or falsely
24 altered a certificate of discharge from the military or naval service of the United States and
25 used, unlawfully possessed or exhibited the certificate knowing the same to be forged,
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counterfeited or falsely altered in violation of Title 18, United States Code, Section 498.

SA Peter K. King
Special Agent
Federal Bureau of Investigation
Boston, Massachusetts

Subscribed and sworn to before me this ____ day of January, 2008.

Joyce London Alexander
United States Magistrate Judge