

UNITED STATES DISTRICT COURT

MIDDLE

DISTRICT OF

NORTH CAROLINA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

TEDDY BEAR PARADISE

Case Number: 1:09MJ1001-1

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about January 5, 2009 in Durham County, in the Middle District of North Carolina defendant(s) did,

threaten to assault, kidnap or murder, a United States Official, a United States Judge, a Federal law enforcement officer or an official whose killing would be a crime under Title 18, United States Code, Section 1114, with intent to impede, intimidate or interfere with such official while engaged in the performance of official duties or with intent to retaliate against the official on account of the performance of official duties

in violation of Title 18, United States Code, Sections 115(a)(1)(B)

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

See attached affidavit of Special Agent Michael Sutton

Continued on the attached sheet and made a part of this complaint: X Yes [] No

Signature of Complainant

Michael Sutton
Printed Name of Complainant

Sworn to before me and signed in my presence,

January 15, 2009
Date

at Durham, North Carolina
City and State

Wallace W. Dixon, United States Magistrate Judge
Name and Title of Judge

Signature of Judge

AFFIDAVIT

I, Michael Sutton, hereafter designated as Affiant, having being duly sworn according to law, state and depose as follows:

I have been a Special Agent with the Federal Bureau of Investigation (FBI) since 2001. I am currently assigned to the Raleigh-Durham Area Safe Streets Gang Task Force. Prior to my employment with the FBI, I served with the Durham County, North Carolina Sheriff's Office for five years, and with the Durham, North Carolina Police Department for six years. My investigative assignments have included a variety of counterterrorism, white collar, organized crime, violent crime, public corruption, crimes against children and fugitive matters.

The information in this affidavit is based upon, among other things, my training and experience in conducting criminal investigations, my personal knowledge, interviews of witnesses, my review of documents, public records, and other evidence, and conversations with other law enforcement agents and officers. I have not included every fact I have learned during the investigation but only sufficient facts to establish probable cause.

This affidavit is submitted for the purpose of establishing probable cause in support of a criminal complaint charging Teddy Bear Paradise, A/K/A/ Denise Soret, A/K/A Carole Denise O''Neal, with a violation of Title 18, United States Code, Section 115(a)(1)(B), which provides that whoever threatens to assault,

kidnap or murder, a United States Official, a United States Judge, a Federal law enforcement officer, or an official whose killing would be a crime under Title 18, United States Code, Section 1114, with intent to impede, intimidate or interfere with such official while engaged in the performance of official duties or with intent to retaliate against the official on account of the performance of official duties shall be subject to a fine and imprisonment of not more than ten years. Title 18, United States Code, Section 1114 prohibits the killing of any employee of the United States or of an agency of the United States while such employee is engaged in, or on the account of, the performance of official duties.

Karen Tremblay is a United States Probation Officer (hereafter USPO) for the Middle District of North Carolina, working in the Durham Office, 2330 Broad Street, Durham, North Carolina. USPO Tremblay is in the supervision unit, wherein she supervises federal defendants serving terms of supervised release. As part of her duties she was assigned supervision responsibilities for Teddy Bear Paradise. Paradise had been convicted on January 10, 2005, in the Northern District of California for two counts of mailing threatening communications, in violation of 18 U.S.C. §§ 876(c), for which she received concurrent 24 month sentences. On December 8, 2005, jurisdiction for supervision was transferred to the Middle District of North Carolina, and on August 17, 2005, supervision commenced. USPO Tremblay was assigned to supervise Paradise.

On August 31, 2005, USPO Tremblay began receiving from Paradise grossly inappropriate voice mail messages and letters, using sexually explicit language. Despite instructions to cease and desist such activity, Paradise continued in her attempts to harass and intimidate USPO Tremblay. During one office appointment on September 8, 2005, USPO Tremblay met Paradise in the lobby of the Durham Probation Office and was told, ““I could have shot or stabbed you coming out the door the way you all do.”” Between August 24, 2005, and December 2, 2005, USPO Tremblay received from Paradise in excess of 35 letters and nine cards. As a result, on December 12, 2005, her case was assigned to another United States Probation Officer, Supervisory United States Probation Officer (hereafter SUSPO) Desdemona Faison. As a result of Paradise’s failure to cease and desist from contacting Ms. Tremblay, on December 13, 2005, a petition for violation of supervised release was sought and on December 20, 2005, a warrant for the arrest of Paradise was signed by the Honorable N. Carlton Tilley, Jr., United States District Judge. On March 30, 2006, Paradise appeared before Judge Tilley on the revocation and admitted the violation. She was sentenced to serve 12 months in the Bureau of Prisons, to be followed by a 24 month term of supervised release.

On January 4, 2007, Paradise'' second term of supervision commenced.

On January 17, 2007, a petition for violation of supervised release was sought and that same day a warrant for the arrest of Paradise was signed by Judge Tilley. The violations were for failing to report to the probation office within 72 hours of release from the Bureau of Prisons, and also for mailing correspondence to the victim of the instant offense. On May 17, 2007, Paradise appeared before Judge Tilley on the revocation and admitted the violations. She was sentenced to serve 12 months in the Bureau of Prisons. No additional term of supervised release was imposed.

It should be further noted that SUSPO Desdemona Faison signed the December 12, 2005, petition and approved the January 17, 2007, petition. SUSPO Faison has been integrally involved in all aspects of Paradise'' supervision.

USPOs serve in a judiciary law enforcement position and assist in the administration of justice and promote community safety, gather information, supervise offenders/defendants, interact with collateral agencies, prepare reports, conduct investigation, and present recommendations to the court. USPOs may also guide the work of probation office support staff. The job as a USPO involves independent decision making and officers are charged with analyzing information to determine and recommend the best course of action. SUSPOs are first line

supervisors who administratively and technically supervise USPOs and other office staff on a day-to-day basis.

On January 5, 2009, at 7:17 p.m., the Durham VA Police were called to a disturbance in the hospital emergency room with a white female reported to be throwing chairs and knocking over trash cans. Police responded and observed a white female, later identified as Teddy Bear Paradise, screaming and generally being disruptive. Paradise stated several times that she was going to blow up the Social Security building and kill an unknown female. Paradise was then taken to a psychiatric room until ER staff could see her.

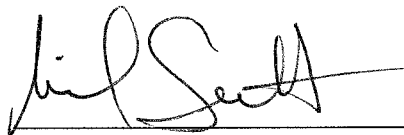
Dr. Cynthia White and Dr. Keith Meador have been involved in the treatment of Paradise since January 5, 2009. During interviews with treating hospital personnel, Paradise made threats to kill both USPO Tremblay and SUSPO Faison, stating at one point that ““she [Paradise] will kill Tremblay and they would have to clean all the blood in the parking lot.”” Dr. White noted that Paradise appeared to be obsessed with a perceived relationship with USPO Tremblay and appeared very angry. Paradise believed, according to Dr. White, that both USPO Tremblay and SUSPO Faison harmed her in the past and that both attempted to have sexual relations with her. Doctors have treated Paradise since

January 5, 2009, but the medication appears to have had no effect and the threats directed towards USPO Tremblay and SUSPO Faison continue.

Paradise has been tentatively diagnosed with borderline personality disorder, according to attending physicians. Doctors state that Paradise does not currently have any active psychiatric illness and she denies depression or suicidal ideation. As a result of the threats on January 12, 2009, the VA Medical Center began the warning process. Attending physicians are of the opinion that Paradise's statements of homicidal ideation have not resolved and are unlikely to change with further hospitalization. Paradise is scheduled to be released on January 16, 2009.

Based upon the foregoing, I submit there is probable cause to believe that Teddy Bear Paradise did threaten to assault, kidnap or murder, a United States Official, a United States Judge, a Federal law enforcement officer, or an official whose killing would be a crime under Title 18, United States Code, Section 1114, with intent to impede, intimidate or interfere with such official while engaged in the performance of official duties or with intent to retaliate against the official on account of the performance of official duties. Title 18, United States Code, Section 1114 prohibits the killing of any employee of the United States or of an agency of the United States while such employee is engaged in, or on the account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B). Karen Tremblay and Desdemona Faison are officials of the

United States as employees of the United States Probation Office, and the threats were intended to impede, intimidate, or interfere with the performance of official duties or to retaliate against said United States Probation Officers on account of official duties.



Michael Sutton
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me this
the 15th day of January, 2009.



Honorable Wallace W. Dixon
United States Magistrate Judge