

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

United States of America

v.

JUSTIN LAMAR COLEMAN

Case No. 3:17-MJ-2022  
~~3:16-MJ~~

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 8, 2016 in the county of Knox in the Eastern District of Tennessee, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 876(c)	Mailing Threatening Communications

This criminal complaint is based on these facts:

See Affidavit Attached, incorporated by reference herein.

Continued on the attached sheet.



Complainant's signature

K. T. Harper, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/27/2017



Judge's signature

City and state: Knoxville, Tennessee

Hon. H. Bruce Guyton, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

UNITED STATES OF AMERICA )  
 )  
 V. )  
 )  
 JUSTIN LAMAR COLEMAN )

3:17-MJ-2022  
CASE NO. ~~3:16-MJ-~~\_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

YOUR AFFIANT, K. T. HARPER, FIRST BEING DULY SWORN, DOES HEREBY DEPOSE AND STATE AS FOLLOWS:

1. I AM A SPECIAL AGENT FOR THE FEDERAL BUREAU OF INVESTIGATION, KNOXVILLE DIVISION. I HAVE BEEN EMPLOYED AS A SPECIAL AGENT WITH THE FBI SINCE JUNE 29, 1999. I HAVE INVESTIGATED CIVIL RIGHTS MATTERS FOR THE PAST 11 YEARS, AND I AM CURRENTLY ASSIGNED TO THE WHITE COLLAR CRIME SQUAD THAT IS RESPONSIBLE FOR INVESTIGATING ALL CIVIL RIGHTS VIOLATIONS IN THE KNOXVILLE DIVISION HEADQUARTERS CITY AREA OF RESPONSIBILITY. I HAVE CONDUCTED AND PARTICIPATED IN NUMEROUS INVESTIGATIONS INVOLVING CIVIL RIGHTS MATTERS SUCH AS HATE CRIMES, HUMAN TRAFFICKING, AND THREATS OF VIOLENCE. DURING MY 11 YEARS OF INVESTIGATING CIVIL RIGHTS MATTERS, I HAVE RECEIVED SPECIALIZED TRAINING FROM THE FBI, THE DEPARTMENT OF JUSTICE CIVIL RIGHTS DIVISION, AND THE TENNESSEE BUREAU OF INVESTIGATION.

2. ON OR ABOUT JULY 26, 2016, THE KNOXVILLE POLICE DEPARTMENT ALERTED THE FBI ABOUT A LETTER DELIVERED TO AN ADDRESS IN KNOXVILLE THAT CONTAINED RACIST LANGUAGE AND THREATS OF VIOLENCE. SINCE THAT TIME, I HAVE EXAMINED 5 ADDITIONAL LETTERS THAT CONTAIN THREATS OF VIOLENCE TOWARD THE ADDRESSEES AND OTHERS. EACH OF THESE LETTERS WERE DELIVERED BY THE UNITED STATES MAIL TO VARIOUS RESIDENTS OF THE KNOXVILLE AREA. THE LETTERS CONTAIN SPECIFIC REFERENCES TO THE RECIPIENT VICTIMS AND THEIR FAMILIES SUCH AS THE NAMES OF FAMILY MEMBERS, PLACES OF EMPLOYMENT, AND RELEVANT FACTS REGARDING RECENT EVENTS IN THEIR PERSONAL LIVES. I INTERVIEWED THE RECIPIENTS OR INTENDED RECIPIENTS OF THE LETTERS. I OBTAINED THE LETTERS AND HAVE PRESERVED THEM AS EVIDENCE IN THIS CASE. THE WRITER OF THE LETTERS CLAIMS TO BE A KKK MEMBER AND EACH OF THE LETTERS CONTAIN THREATS OF HOMICIDE, SEXUAL ASSAULT, DISMEMBERMENT, OR OTHER SERIOUS INJURY.

3. EACH OF THE LETTERS CLAIM TO BE WRITTEN BY "JEFF MCCOWN" AND THEY GENERALLY INVITE THE RECIPIENT TO COME TO THE PLACE OF BUSINESS OF "JEFF MCCOWN" FOR CONFRONTATION. THE LANGUAGE IN THE LETTERS TENDS TO INCITE VIOLENCE IN THAT IT CONTAINS EXPRESSIONS OF RACIAL HATRED AND THREATS OF HARM TO THE RECIPIENTS AND THEIR FAMILIES. THE LETTERS ARE WRITTEN IN THE SAME VERY DISTINCTIVE HANDWRITING AND THEY ARE WRITTEN IN BLUE OR BLACK INK. EACH OF THE LETTERS APPEAR TO BE WRITTEN BY THE SAME PERSON. THE ADDRESSES ON THE OUTSIDE OF THE ENVELOPES ARE ALSO HANDWRITTEN AND APPEAR TO BE THE SAME DISTINCT HANDWRITING AS THE LETTERS THEMSELVES. THE RETURN ADDRESS ON THE LETTERS IS LISTED AS "JEFF MCCOWN" WITH THE ADDRESS LISTED AS ONE THAT BELONGS TO A KNOXVILLE AREA MAN BY THAT NAME. NONE OF THE RECIPIENTS ARE FAMILIAR WITH JEFF MCCOWN OR HIS BUSINESS. THESE LETTERS WERE RECEIVED BETWEEN MAY, 2016 AND DECEMBER 27, 2016.

3. ON OR ABOUT AUGUST 15, 2016, I LEARNED THAT JEFF MCCOWN AND HIS WIFE OWN A BUSINESS AT THE ADDRESS LISTED ON THE ENVELOPES AND IN THE LETTERS SENT BY THE DEFENDANT. THE MCCOWN'S WERE INTERVIEWED BY AN OFFICER FROM THE KNOXVILLE POLICE DEPARTMENT WHO SHARED THE RESULTS OF THAT INTERVIEW WITH ME. THE MCCOWNS DENIED SENDING ANY LETTERS SUCH AS THE ONES RECEIVED BY THE VICTIMS IN THIS CASE. THE MCCOWNS STATED THAT THE SIGN AT THE ENTRANCE OF THEIR BUSINESS WAS VANDALIZED AROUND THE TIME THAT THE LETTERS BEGAN TO BE RECEIVED. THE MCCOWNS STATED THAT SEVERAL YEARS AGO, JEFF MCCOWN WAS INVOLVED IN AN ALTERVATION WITH AN INDIVIDUAL AT THE BUSINESS THAT RESULTED IN KNOX COUNTY SHERIFF'S OFFICE FILING A REPORT. I REVIEWED THIS REPORT AND DETERMINED THE SUBJECT INVOLVED AS JUSTIN LAMAR COLEMAN. THE MCCOWNS STATED THAT THE SOMEONE USING THE FACEBOOK ACCOUNT "LAMAR COLEMAN" HAD POSTED SLANDEROUS COMMENTS OF A SEXUAL NATURE REGARDING JEFF MCCOWN ON THE MCCOWNS' BUSINESS' FACEBOOK ACCOUNT IN THE FALL OF 2015.

4. DURING THIS INVESTIGATION, THE MCCOWN'S HAVE RECEIVED AT THEIR BUSINESS AT LEAST 2 LETTERS MARKED "RETURN TO SENDER" BY THE UNITED STATES POSTAL SERVICE. THESE LETTERS WERE ADDRESSED TO PERSONS UNKNOWN TO THE MCCOWNS AND THE RETURN ADDRESS WAS THEIR BUSINESS ADDRESS. THE MCCOWN'S DID NOT WRITE ANY OF THESE LETTERS. THESE LETTERS CONTAINED SIMILAR RACIST LANGUAGE AND THREATS OF HARM AS THE LETTERS REFERENCED ABOVE. THE HANDWRITING ON THESE ENVELOPES AND LETTERS APPEAR TO MATCH THE LETTERS REFERENCED ABOVE. ON NOVEMBER 28, ~~2017~~<sup>2016</sup>, THE MCCOWN'S BUSINESS WAS AGAIN VANDALIZED.

5. ON DECEMBER 19, 2016 THE MCCOWNS RECEIVED A THREATENING AND HARASSING LETTER AT THEIR RESIDENCE ADDRESSED TO "JEFF". THE RETURN NAME AND ADDRESS ON THE ENVELOPE WAS "MICHEAL BERRY, 1407 BOXER LANE KNOXVILL TN." THE HANDWRITTEN LETTER CONTAINED THREATS TO SHOOT AND KILL JEFF AND TO BURN HIS HOUSE DOWN. THE AUTHOR FURTHER

ADMITTED IN THE LETTER TO VANDALIZING THE MCCOWNS' BUSINESS SIGN AND DESCRIBED PARTICULAR DETAILS OF THE VANDALISM, TO INCLUDE USING ORANGE SPRAY PAINT AND THE PROFANITY WRITTEN ON THE SIGN. THE HANDWRITING ON THE OUTSIDE OF THE ENVELOPE AND CONTAINED WITHIN THE LETTER APPEARED TO BE THE SAME AS THE VANDALISM ON THE SIGN AND THE OTHER LETTERS IN THIS INVESTIGATION.

6. DURING THE COURSE OF THE INVESTIGATION, YOUR AFFIANT CONDUCTED AN INTERVIEW WITH RICHARD H. BURRIS, THE RECIPIENT OF ONE OF THE RACIST AND THREATENING LETTERS POSTMARKED ON SEPTEMBER 9, 2016. BURRIS IS EMPLOYED AT SHANNONDALE HEALTHCARE ON MIDDLEBROOK PIKE IN KNOXVILLE, TN. JUSTIN LAMAR COLEMAN IS ALSO EMPLOYED AT SHANNONDALE HEALTHCARE. BURRIS IS FAMILIAR WITH JUSTIN LAMAR COLEMAN AND KNOWS HIM AS A CO-WORKER. BURRIS ADVISED THAT HE KNOWS THAT JUSTIN LAMAR COLEMAN LIVES ON OVERTON LANE. THE LETTER ADDRESSED TO BURRIS INCLUDED SPECIFIC THREATS TO USE A CHAINSAW TO DISMEMBER THE VICTIM<sup>V</sup> AND THE VICTIM'S WIFE. THE LETTER ALSO INCLUDED THREATS TO CANNIBALIZE THE VICTIM.

7. ON JANUARY 23, 2017, A STATE SEARCH WARRANT ISSUED BY KNOX COUNTY JUDGE TONY W. STANSBERRY ON JUSTIN LARMAR COLEMAN'S RESIDENCE AT 1301 OVERTON LANE, KNOXVILLE, TN. DURING THE SEARCH, EVIDENCE WAS SEIZED LINKING JUSTIN LAMAR COLEMAN TO WRITING THE AFORESAID LETTERS, TO INCLUDE SAMPLE LETTERS, STAMPS, NAMES OF INDIVIDUALS WHOM LETTERS WERE MAILED TO, A NOTEBOOK THAT HAD EXACT WORDING AS LETTERS MAILED TO INDIVIDUALS AND OTHER ITEMS CONNECTING HIM TO THE LETTERS.

8. ON JANUARY 23, 2017, THE AFFIANT LEARNED THAT THE DAUGHTER OF A LOCAL PASTOR RECEIVED A LETTER VIA THE MAIL THREATING TO RAPE HER THEN KILL HER BY CUTTING OFF HER LEGS AND HEAD. THE WRITER STATED THAT HE WAS GOING TO CUT OFF HER FATHER'S DICK AND MAKE HIM EAT HIS OWN DICK. A UNOPENED LETTER ADDRESSED TO PASTOR DARYL ARNOLD WAS TAKEN AS EVIDENCE FROM JUSTIN LAMAR COLEMAN'S BEDROOM. THE HANDWRITING, ENVELOPE AND OTHER DISTINCTIVE CHARACTERISTS OF THE LETTER MATCH THE LETTERS REFERENCED ABOVE, BOTH THOSE RECEIVED BY OTHER VICTIMS IN THIS CASE AND LETTERS RECOVERED AS EVIDENCE FROM THE DEFENDANT'S RESIDENCE. THE LETTER TO THE PASTOR'S DAUGHTER IS POSTMARKED DECEMBER 8, 2016.

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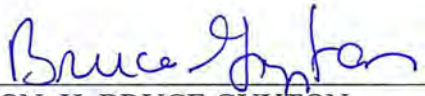
9. BASED ON THE ABOVE LISTED INFORMATION, OBSERVATIONS, AND TRAINING YOUR AFFIANT BELIEVES THAT THERE IS ENOUGH PROBABLE CAUSE <sup>✓</sup>CHARGE <sub>To</sub> JUSTIN LAMAR COLEMAN WITH TITLE 18 USC 876(C).

FURTHER AFFIANT SAYETH NOT



K. T. HARPER  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

SWORN TO AND SUBSCRIBED BEFORE  
ME THIS 27 DAY OF JANUARY, 2017, AT  
KNOXVILLE, TENNESSEE.



HON. H. BRUCE GUYTON  
UNITED STATES MAGISTRATE JUDGE