

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Sara J. Cunning having been duly sworn, state;

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have served in that capacity since May 2012. I am a graduate of the FBI academy, where I received approximately five months of training in conducting federal criminal investigations. I am currently assigned to the FBI's Louisville Division investigating Complex Financial Crimes. During my time as an agent I have also investigated violent crimes, child pornography, firearms, and narcotics. I have interviewed subjects, participated in search warrants, collected and reviewed evidence including with electronic devices, analyzed electronic devices, location data, requested legal process, and testified before the grand jury.

2. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510 (7) of Title 18 United States Code. As such, I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 21, United States Code, Section 841/846 and Title 18, United States Code § 922.

3. While employed by the FBI, I have been assigned as the primary investigator and have also assisted on cases involving firearms. As such, I have initiated and/or participated in investigations involving firearms. I have conducted or participated in surveillance, monitoring of wiretaps, the execution of search warrants, the operation and debriefing of informants, and have participated in other investigative activities. Through my training, education, and experience, I have become familiar with the manner in which firearms are illegally possessed.

4. The statements contained in this affidavit are based in part on information I have learned through my own investigation, experience, and background as an FBI Special Agent. The statements are also based on information gained from other law enforcement officials and individuals who have assisted in this investigation.

II. PURPOSE STATEMENT

5. The purpose of this affidavit is to obtain an arrest warrant for James NOTT for violations of 18 U.S.C. § 922(g)(1) (prohibited person in possession of a firearm).

6. I have not included every fact known to me concerning this investigation and have set forth only those facts that I believe are necessary to establish probable cause to believe that NOTT violated federal law.

III. SOURCES OF INFORMATION

7. The information contained in this affidavit is based on my personal observations, experience, training and information provided to me by other law enforcement officials.

IV. PROBABLE CAUSE

Scheme to Purchase and Sell Stolen Body Parts

8. In June 2022, the East Pennsboro Township Police Department received a tip of possible human remains located at the residence of Jeremy Pauley (“Pauley”). Pauley resided in Enola, Pennsylvania. After conducting an interview with Pauley’s wife, Sarah Pauley, Officers of East Pennsboro Township Police Department executed a search warrant at Pauley’s residence. During this search warrant human remains were seized, including organs and skin. Sarah Pauley provided officers screen shots of Facebook communications between Pauley and Candace Chapman (“Chapman”). During the course of a subsequent FBI investigation, it was determined that Chapman was employed with a mortuary located in Little Rock, Arkansas. During the course of her employment, Chapman was stealing remains that were due to be cremated and selling them

to Pauley over Facebook Messenger. Chapman paid Pauley via PayPal. Chapman sold Pauley various human remains including hearts, brains, lungs and two fetal specimens.

9. According to an interview conducted with Pauley, he provided information on a network of individuals involved in the sale and transportation of fraudulently obtained human remains.

10. The FBI investigation determined that one of the individuals that was part of the network was Cedric Lodge (“Lodge”). Lodge was employed as the morgue manager for the Harvard Medical School (HMS) Anatomical Gift Program. Lodge was stealing body parts from cadavers donated to HMS and selling them over the internet. Lodge communicated via Facebook Messenger with individuals regarding the sale and shipment of human remains. In some instances he collected payment via PayPal funds.

NOTT’s Participation in the Scheme

11. According to an FBI search warrant conducted on Pauley’s Facebook account within the last year, Pauley was Facebook friends with “William Burke”.¹ Communications between the two included PayPal information in which the Facebook user “William Burke” provided his PayPal user information as jamesnott65@yahoo.com. According to PayPal records, this account is registered to James Nott. He utilized an address of 353 Love Ave #3, Mt Washington, KY as of September 2022.

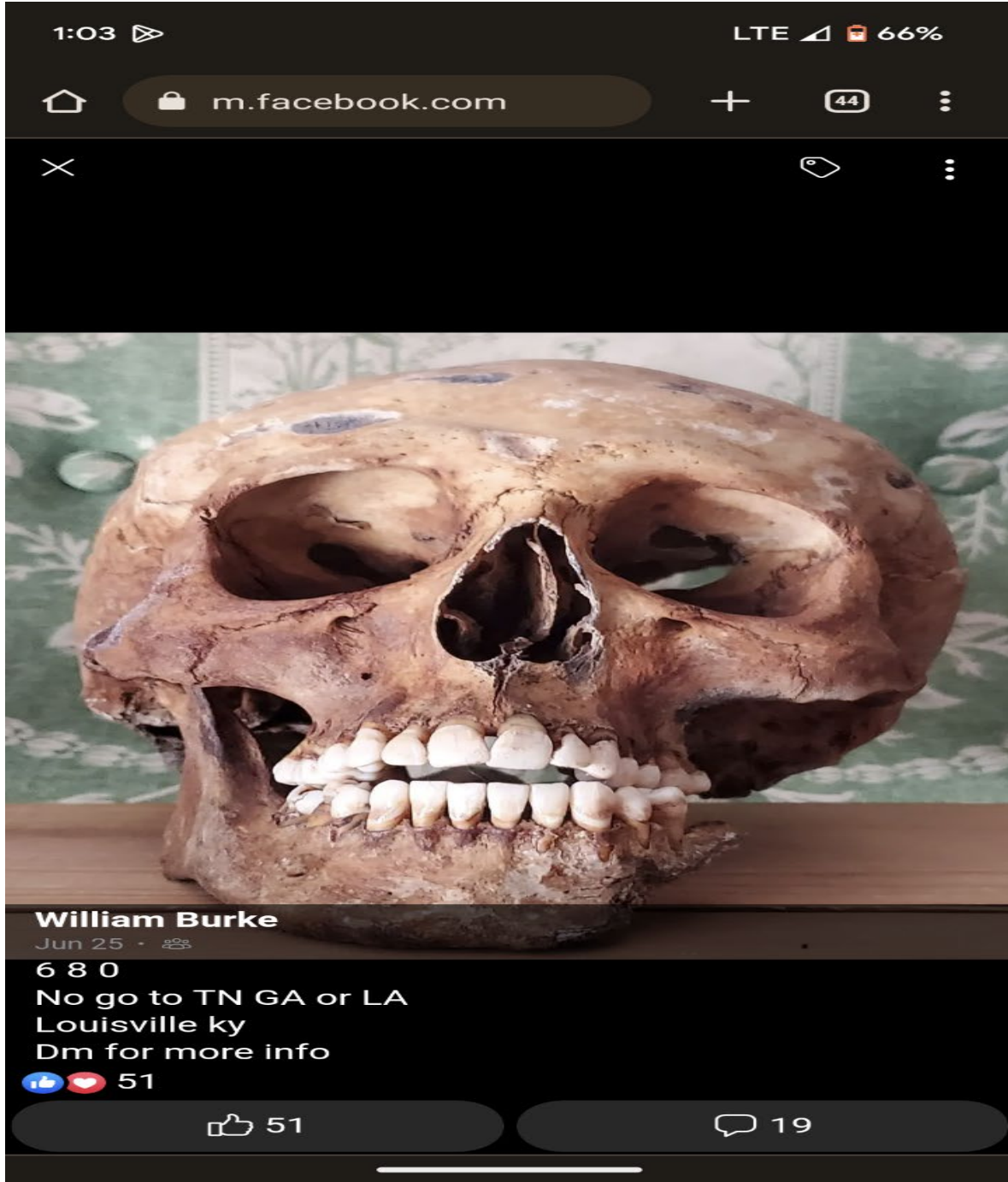
12. Pauley’s Facebook search warrant revealed conversations between Pauley and NOTT regarding the sale and shipment of human remains.

¹ William Burke was a serial killer active in Edinburgh between 1827 and 1828 along with his partner, William Hare. Burke and Hare sold their victims’ bodies to Dr. Robert Knox, an influential lecturer in the Anatomy Department at the University of Edinburgh.

13. On May 27, 2022, NOTT using the Facebook username “William Burke” sent Pauley photos and videos of skulls for sale via Facebook. NOTT stated “these will be here soon.. not claimed yet”. Pauley replied “yeah some of these prices are fucking garbage out there. I don’t mind paying up a little for shop stock. Makes things look good. How much total for the couple and the last video you sent plus the spines?” NOTT sent several voice messages, however the content of those messages is not recoverable. Pauley replied in text “oh I feel ya! Just let me know a grand total and I’ll get you paid. No rush!” NOTT again sent several voice messages and Pauley replied “works for me!” Pauley resides in the state of Pennsylvania and NOTT resides in Kentucky.

14. Law enforcement officers have viewed NOTT’s public Facebook page and have seen him post human remains for sale on Facebook as recently as June 2023. The following images were obtained from NOTT’s Facebook account with the username “William Burke”:





15. On or about June 13, 2023, Pauley, Lodge and four other individuals were charged in the Middle District of Pennsylvania with violations of Title 18 U.S.C. § 2314 (interstate transport of stolen goods) and 18 U.S.C. §371 (conspiracy).

NOTT's Unlawful Possession of Firearms and Weapons

16. On or about July 10, 2023, I applied for and was granted federal search warrants from the Western District of Kentucky authorizing the lawful search of NOTT's residence located at 353 Love Avenue #3, Mt. Washington, Kentucky 40047 (the "Residence"), NOTT's vehicle a White Chevrolet Colorado, KY License Plate 3695HM, VIN 1GCGTDE37G1368177 (the "Chevy"), and the person of James NOTT.

17. The investigation, including surveillance operations, has shown that NOTT lived at the Residence and drove the Chevy.

18. A DMV check for NOTT reveals that NOTT has a listed address as 353 Love Avenue, Apartment #3, Mt. Washington, KY 40047-the Residence. Surveillance conducted in the course of the investigation has shown NOTT leaving the Residence several times, entering his Chevy and exiting the premises. United States Postal Service confirmed NOTT lived at the Residence. According to the United States Postal Service, NOTT receives things from out of the country and then resells those items within the United States.

19. On the morning of July 11, 2023, law enforcement officers with the FBI executed a search warrant at 353 Love Avenue, Apartment #3, Mt. Washington, KY 40047-the Residence.

20. NOTT was the only individual present at the Residence when the lawful search warrant was executed on the morning of July 11, 2023. In addition, the Chevy was parked in the driveway of the Residence.

21. Upon arrival to execute the lawful search, an FBI agent asked NOTT if anyone else was inside the residence. NOTT responded, "only my dead friends."

22. In the course of the lawful search of the Residence, FBI located an AK-47 rifle bearing Serial Number, 56-26142925 with a loaded magazine. There was no round in the chamber.

The AK-47 rifle was located within three feet of the front door of the Residence and leaning on the mattress where NOTT slept. A bag of ammunition was on the other side of the room along with approximately six empty magazines.

23. In the course of the lawful search of the Residence, FBI agents also located a loaded .38 special revolver, Charter Arms, Serial Number 14-27182 on the table in the Residence.

24. In the course of the lawful search of the Chevy on July 11, 2023, FBI agents located a crate with three AK-47 Op rod and bolts and one additional bolt. Inside the crate in the Chevy, FBI agents also located seven AK-47 empty magazines and a drum magazine. Behind the drivers' seat of the of the Chevy on the floorboard FBI agents located 10 fully loaded AK-47 magazines with additional ammunition in an ammunition box.

25. In the course of the lawful search of the Residence, FBI agents located inert grenades and two plates for body armor.

26. In the course of the lawful search of the Residence, FBI agents located human remains including approximately 40 human skulls, spinal cords, femurs, and hip bones. The skulls were decorated around the furniture. One skull had a head scarf around it. One skull was located on the mattress where NOTT slept. A Harvard Medical School bag was found inside the Residence.

27. During the course of the investigation, I reviewed court records regarding NOTT. According to court records, in August 2011, NOTT pled guilty in the Western District of Kentucky Case No. 3:11-CR-00053 to felony offenses including violations of Title 26 U.S.C, §§ 5841, 5861(d), and 5871 (Possession of an Unregistered Destructive Device) and Title 18 U.S.C. § 922(g)(3), 924(a)(2), and 924(d) Possession of a Firearm by an Unlawful User of Marijuana. According to the facts in the plea agreement, NOTT was in possession of any combination of parts

from which a destructive device may be readily assembled, including electric blasting caps, detonation cord, igniting devices, timed fuses, mercury switches, black powder primers, metal pipe with matching end caps, Tannerite-type material, aluminum powder inert grenade components, and ammonium nitrate. NOTT also admitted in the plea agreement to being a regular user of marijuana and was also found to be in possession of a Bushmaster BAR-10 .308 caliber rifle with 19 loaded 20-round magazines.

28. A Judgment and Conviction in Case No. 3:11-CR-00053 was entered on November 11, 2011 against NOTT for his felony violations of Title 26 U.S.C, §§ 5841, 5861(d), and 5871 (Possession of an Unregistered Destructive Device) and Title 18 U.S.C. § 922(g)(3), 924(a)(2), and 924(d) Possession of a Firearm by an Unlawful User of Marijuana. NOTT was sentenced to 30 months' imprisonment followed by three years of supervised release.

29. The AK-47 rifle recovered in the case was manufactured outside the Commonwealth of Kentucky and therefore travelled in interstate commerce prior to being recovered on July 11, 2023.

30. The .38 special, Charter Arms, revolver recovered in the case was manufactured outside the Commonwealth of Kentucky and therefore travelled in interstate commerce prior to being recovered on July 11, 2023.

31. During a Mirandized interview of NOTT conducted on July 11, 2023, in conjunction with the execution of a lawful search warrant, NOTT stated to law enforcement that the AK-47 rifle and the .38 special, Charter Arms, revolver were his firearms and that he bought the revolver at a garage sale.

32. NOTT admitted during the interview that he frequently used Marijuana. NOTT further admitted that bags of marijuana found inside NOTT's Residence were his. According to

interviews conducted of residents of the other apartments in NOTT's building, there was a complaint made to the landlord regarding the marijuana smell from NOTT's apartment in the Winter of 2022-2023.

V. **CONCLUSION**

36. Based on the foregoing, there is probable cause to believe that while in the Western District of Kentucky, Bullitt County, Kentucky, James NOTT engaged in the possession of a firearm by a prohibited person in violation of Title 18, United States Code, § 922(g)(1).

s/ Sara Cuning
Sara J. Cuning
Special Agent
Federal Bureau of Investigation

Sworn to me and subscribed by telephone in accordance with Fed. R. Crim. P. 4.1 this 11th day of July 2023.



Colin H Lindsay, Magistrate Judge
United States District Court