

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION

UNITED STATES OF AMERICA)
)
 v.)
)
 ALESHIA HOPE STUART)

2015 JAN 30 A 9:43

No. 2:15-MJ-16
Judge Inman

CRIMINAL COMPLAINT

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

COUNT ONE

The United States Attorney charges that from on or about December 21, 2014 to on or about January 29, 2015, in the Eastern District of Tennessee, the defendant, ALESHIA HOPE STUART, did combine, conspire and confederate with another to willfully and knowingly use a facility of interstate commerce, specifically telephones and cellular telephones, with the intent that a murder be committed in violation of the laws of the State of Tennessee and the United States as consideration for a promise and agreement to pay a thing of pecuniary value, namely money, in violation of Title 18, United States Code, Section 1958.

This criminal complaint is based on these facts:

1. On January 26, 2015, a Federal Bureau of Investigation (FBI) Confidential Human Source (CHS) made a telephone call to Michael Dale Keller's ("Keller") landline, 423-625-0729 located at his residence, 234 View Drive, Newport, Cocke County, Tennessee, to arrange a meeting previously requested by Keller to arrange a murder for hire at Keller's request. During the telephone conversation the CHS and Keller discussed plans for Keller to meet with a third party whom

Keller could hire to carry out the intended murder.

2. On January 27, 2015, Keller met with a Federal Bureau of Investigation (FBI) Special Agent acting in an undercover capacity (“UC-1”) at the Econo Lodge Motel, Room 207, 531 Patriot Way, Dandridge, Tennessee. Keller solicited UC-1 to murder the intended victim (“IV”) Keller explained to UC-1 he wanted IV to be killed because IV’s wife, ALESHIA HOPE STUART (“STUART”) was going to sign over to Keller her rights as the beneficiary of a \$90,000 life insurance policy, insuring the life of IV, to Keller if Keller would arrange to have IV killed. Keller offered UC-1 \$5,000 to murder IV and told UC-1 he would be paid after the job was done. Keller offered to let UC-1 hold the title to his truck as collateral until he could be paid. Keller sent two pictures of IV, using a cellular telephone, 423-237-3216, to UC-1’s cellular telephone, for the purpose of identifying the target of the murder.

3. UC-1 provided a cellular telephone to Keller with instructions to only use the provided cellular telephone to contact UC-1. On January 28, 2015, at approximately 1:05a.m. Keller used the provided cellular telephone, 828-620-5656, to send one text message to UC-1’s cellular telephone that read “Got truck title now to just ready for you”. Keller sent a second message on the same day at approximately 1:22 a.m. to the same number that read “Got title to truck to now.”

4. On January 29, 2015, at approximately 10:30 a.m., Keller met with UC-1 at the Econo Lodge Motel, Room 207, 531 Patriot Way, Dandridge, Tennessee. Keller handed the title to a truck, titled in the name of Keller, to UC-1 and indicated that the truck

title would serve as collateral for Keller's promise to pay \$5,000 to UC-1 following the murder of IV and Keller's receipt of the proceeds of the insurance policy.

5. On January 29, 2015, Keller agreed to assist law enforcement officers by placing a recorded phone call to the telephone of STUART. During the phone conversation, Keller indicated to STUART that UC-1 needed additional consideration to carry out the planned murder of IV. STUART replied that she could provide a ring with a gemstone to UC-1 as consideration to commit the planned murder. STUART indicated that she would meet UC-1 and Keller at the Econo Lodge Motel in Dandridge, Tennessee with the ring.

6. On January 29, 2015, while en route from her home to the Econo Lodge Motel in Dandridge, Tennessee, STUART was stopped by law enforcement officers. STUART had in her possession the ring that she planned to give to UC-1 for consideration to commit the planned murder.




CASEY HELM
FBI Special Agent

Sworn to before me and signed in my presence.

Date: 1/30/2015

City and state: Greeneville, Tennessee



DENNIS H. INMAN
United States Magistrate Judge