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September 27th, 2025

TO: U.S. Attorney, Eastern District of Tennessee
CC: [REDACTED] FBI Knoxville

Re: **Urgent Request** for Federal Investigation of Compromised Equities, Rule 6(e) Breaches, Fraudulent Activity, and Civil Rights Violations in Knox County, TN

INTRODUCTION

This request is submitted because the safety of FBI Special Surveillance Group (SSG) personnel, the secrecy of federal grand jury proceedings, and the integrity of classified investigative equities are presently compromised through state proceedings in **Knox County Criminal Court 120001**. Sensitive federal materials, including unredacted FBI FISUR surveillance logs, “National Threat Band II” designations, Rule 6(e) grand jury content, and federal agent identifiers have been unlawfully disseminated and remain exposed on the public record.

Despite repeated motions and requests, no protective action has been taken to seal or secure these equities. The result is a continuing national security threat and a systemic breach of federal secrecy law.

The record further shows falsified affidavits, suppression of body-worn camera evidence, and participation by uncertified personnel in armed raids. These actions amount to **fraud on the court, official misconduct, malfeasance in office, and violations of federal law**. The Department of Justice and the U.S. Attorney’s Office for the Eastern District of Tennessee have both the authority and the duty to intervene to secure these equities, investigate the misconduct, and protect the rights of affected citizens.

FACTUAL SUMMARY

1. Unlawful Disclosure of FBI Surveillance Records

- Over 110 pages of FBI FISUR surveillance logs, labeled *UNCLASSIFIED // FOUO*, were disseminated in state discovery. These contained “National Threat Band II,” “SSG Surveillance Type,” and unredacted FBI agent names.
- No DOJ authorization, court order, or redaction review was obtained.

2. Grand Jury Secrecy Violations (Rule 6(e))

- Six local officers were Rule 6(e) designees; at least five now serve as state trial witnesses.
- No federal disclosure order exists; no firewall or privilege log was maintained.
- Case timelines produced by the Knox County Sheriff’s Office confirm that the **FBI withdrew from the investigation on August 7, 2021**, noting that “the FBI is no longer involved.” Only 18 days later, on **August 25, 2021**, KCSO presented the same allegations to a Knox County grand jury, resulting in indictments. This demonstrates a direct handoff of federal investigative equities into state prosecution despite federal declination.

3. Affidavit Misrepresentations

- Detective Lee Strzelecki’s August 31, 2021 warrant affidavit omitted the fact that indictments and capias warrants had already been issued, misleading the court.
- An undercover sale showing compliance with ID laws and lawful intent was deliberately omitted to present a false narrative.

4. Suppression of Body-Worn Camera Evidence

- KCSO denied in writing for 17 months that no BWC footage existed and continue to misrepresent through falsified documents the existence of BWC’s.
- ADA William Bright certified “complete” discovery responses that were false.
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5. Unauthorized Law Enforcement Activity

- Eric Edlin and Jerry Glenn, not POST-certified, carried firearms, detained civilians, and seized property during the raid.
- Edlin assisted in the destruction of warehouse cameras, an act documented on security footage.
- The state conducted a 10 month investigation into these certification requirements and released a P.O.S.T. Commission investigative report on December, 13th, 2024 confirming the lack of statutory requirements.

6. Political Misuse of Law Enforcement

- Sheriff Tom Spangler's campaign director, Kimberly Glenn, was present during the raid. Officers expressed concern she was "bugged," and political comments were captured on video. Days later, Kimberly Glenn orchestrated a press conference where Sheriff Spangler stated that he had, with federal assistance, closed a local business after busting a complex criminal enterprise.

POTENTIAL FEDERAL CRIMINAL VIOLATIONS

- **18 U.S.C. § 1001 (False Statements and False Writings):** Prohibits knowingly and willfully making materially false statements, concealing material facts, or using false writings/documents in any matter within federal jurisdiction. Applies to affidavits and discovery certifications tied to FBI reports and federal grand jury proceedings. *This includes indisputable proof that Deputy David West falsified five separate warrant service reports, which were then approved by Frederick "Woody" Martin. These falsifications constitute false writings under federal jurisdiction.*
- **18 U.S.C. § 1519 (Falsification of Records):** Criminalizes the destruction, alteration, or falsification of documents to obstruct or influence federal proceedings. The falsified service reports, approved at the supervisory level, directly altered the record of warrant service in a case intertwined with federal equities, and were used to obstruct judicial oversight of federally entangled warrants.
- **18 U.S.C. § 1503, § 1510, § 1512 (Obstruction of Justice and Witness Tampering):** Covers withholding indictments to conduct uncounseled interrogations and efforts to obstruct grand jury integrity.

- **Fed. R. Crim. P. 6(e):** Prohibits disclosure of grand jury materials without court order. Local officers disseminated Rule 6(e) materials despite explicit DOJ secrecy instructions.
- **18 U.S.C. § 666 (Theft or Bribery Involving Federally Funded Programs):** Knox County receives DOJ/DHS funding while deploying uncertified personnel in federally entangled raids.
- **18 U.S.C. § 912 (False Personation of a Federal Officer):** Applies where local deputies invoked FBI task force authority without proper deputization.
- **18 U.S.C. § 1621 (Perjury)** – Criminalizes willfully false statements under oath in any federal proceeding or affidavit. Applies to materially false warrant affidavits omitting indictments and exculpatory undercover transactions.
- **18 U.S.C. § 1623 (False Declarations Before Grand Jury or Court)** – Prohibits knowingly false declarations in court or grand jury contexts, including sworn affidavits and discovery certifications. Fits the omissions and misrepresentations in affidavits tied to Rule 6(e) materials.
- **18 U.S.C. § 401 (Contempt of Court)** – Punishes willful disobedience of court rules or orders, including secrecy mandates. Applies to unauthorized dissemination of Rule 6(e) grand jury content by local officers.
- **18 U.S.C. § 641 (Theft of Government Property)** – Covers unauthorized dissemination and exposure of federal equities, including unredacted FISUR logs, FD-302 reports, and FOUO materials treated as government property.
- **18 U.S.C. § 371 (Conspiracy to Defraud the United States)** – Prohibits schemes to defraud federal agencies or interfere with their operations. Applies to the coordinated misuse of FBI task force authority, suppression of evidence, and falsified affidavits that undermined federal investigative integrity.
- **18 U.S.C. § 4 (Misprision of Felony):** Criminalizes knowing concealment of a felony and failure to notify federal authorities. Applies to supervisors and prosecutors who became aware of falsified warrant service reports, concealed body-worn cameras, and unauthorized participation of uncertified deputies but failed to report these violations to federal authorities. This statute is particularly relevant given the ongoing concealment of federal equities, including Rule 6(e) materials and FBI FISUR surveillance logs.

CIVIL RIGHTS, SIXTH AMENDMENT, DUE PROCESS, AND EQUAL PROTECTION VIOLATIONS

The misconduct also rises to the level of direct civil rights and constitutional violations enforceable under federal law:

- **18 U.S.C. § 242 (Deprivation of Rights Under Color of Law):** Applies to the unlawful detention of civilians by uncertified personnel, denial of Sixth Amendment rights through concealed indictments, and suppression of exculpatory evidence.
- **18 U.S.C. § 241 (Conspiracy Against Rights):** Applies where multiple officials acted together to conceal body-worn camera evidence, falsify service reports, and deny defendants their constitutional protections.
- **42 U.S.C. § 1983 (Civil Action):** Provides a civil enforcement pathway for damages against state actors and agencies for unlawful seizures, wrongful detentions, malicious prosecution, and violations of due process and equal protection.

In addition, the state record contains indisputable proof of systemic **Sixth Amendment and due process violations**:

- On **August 25, 2021**, indictments and NIA Capias warrants were issued but deliberately withheld during the **September 3, 2021 raid**. Defendants, including myself, were interrogated without being informed of charges, without counsel present, and in some cases misled about legal representation.
- On **August 24, 2021**, the Tennessee Attorney General's Office expressly warned KCSO and ADA Bright in writing that the Sixth Amendment right to counsel attaches at indictment. This directive was ignored, and unconstitutional interviews proceeded in direct violation of *Massiah v. United States*.
- Falsified incident reports were submitted stating that Deputy David West served the capias warrants on-site. These were approved by Frederick "Woody" Martin, despite incontrovertible proof they were false. The Sheriff's Office then submitted a personnel list certified by the DA falsely stating that Martin had "no body-worn camera" In an effort to conceal the falsifications. Video evidence proves he was visibly wearing one throughout the raid.
- For more than **four years, no meaningful court action has occurred** in the state proceedings with 3 ½ year-old motions left unheard. This unnecessary delay has prejudiced the defense and compounded the ongoing constitutional violations.

- During this time, **22 defense attorneys have participated in the case**, with multiple attorneys citing **DA intimidation and coercion** as their reason for withdrawal. This widespread prosecutorial interference deprived defendants of stable representation and obstructed the ability to prepare a defense while leaving pro se not only as the only option, but the best option.

These actions demonstrate deliberate violations of *Massiah*, *Brady*, *Giglio*, *Franks v. Delaware*, and *Barker v. Wingo*. They constitute **knowing falsification of records, perjury, obstruction of justice, conspiracy against rights, deprivation of constitutional rights under color of law, denial of due process, and interference with the right to counsel**.

The Sheriff's Office also violated the **14th Amendment's Equal Protection and Due Process Clauses** through defamatory and retaliatory public statements:

- In a public press conference, Sheriff Tom Spangler declared that a criminal enterprise had been shut down and the business was terminated. These statements were false and the business continued to operate.
- Despite the indictments and false statements, Browder Metals, LLC remained a duly licensed scrap metal dealer under state law. This license was never suspended or revoked.
- Spangler's comments destroyed essential business relationships, caused reputational ruin, and directly contributed to the eventual collapse of the business. This constitutes a classic **stigma-plus violation**: defamatory government statements combined with tangible economic harm.
- In the same press conference, Sheriff Spangler explicitly referenced FBI and IRS assistance. This publicly linked federal agencies to defamatory accusations, compounding the damage and reinforcing the federal equities entanglement.

Together, these actions deprived defendants of **equal protection under the law and due process before being deprived of liberty and property interests**. They also illustrate how federal equities were misused as part of a coordinated campaign to retaliate against protected rights and destroy a business outside lawful judicial process.

FORFEITURE MISCONDUCT AND PROPERTY SEIZURE VIOLATIONS

The state record also documents systemic misconduct tied to the September 3, 2021 seizure of property from Browder Metals, LLC:

- **False Warrant Affidavit:** Detective Lee Strzelecki submitted a search warrant affidavit on August 31, 2021, omitting the fact that indictments and NIA Capias warrants had already issued. He also deliberately excluded a prior undercover sale (Nov. 20, 2020) that showed compliance with ID requirements. Early drafts falsely claimed no ID was requested; when disproved, the sale was scrubbed entirely. This constitutes falsification of records and perjury.
- **Suppression of Body-Worn Camera Evidence:** The Sheriff's Office claimed for 17 months that no video existed, despite photographic proof. Even after a February 3, 2023 discovery order, no footage or metadata was produced.
- **Participation of Unauthorized Personnel:** Eric Edlin, lacking POST certification, carried a firearm, detained civilians, seized inventory, and destroyed security cameras. His participation rendered the seizure fatally defective under Tennessee law and constitutes unlawful impersonation of an officer under federal law.
- **Breach of Discovery Agreement:** On February 3, 2023, the parties agreed that suppression of evidence would justify dismissal. Subsequent disclosures confirmed suppression of BWCs, personnel records, and metadata.

PRO SE FILINGS AND UNRESOLVED SECURITY RISKS

- **Motion to Challenge Indictment, Disclose Grand Jury Transcripts, and Report Unauthorized Disclosure to DOJ (Sept. 9, 2025)**
 - Documents unredacted FBI FISUR logs, FD-302 reports, and Rule 6(e) grand jury materials used in state presentments without DOJ authorization.
 - Exposes that Special Surveillance Group (SSG) personnel identities, Band II threat classifications, and federal agent names were improperly circulated.
 - Requests transcript disclosure, indictment challenge, and referral to DOJ.
- **Motion to Seal Subpoenas (Sept. 10, 2025)**
 - Seeks to seal subpoenas directed to FBI agents and SSG personnel, as well as related FBI FD-302 and FISUR surveillance records.

- Notes the risk that public disclosure of these identities and materials could compromise federal personnel safety, reveal sensitive investigative techniques, and prejudice ongoing matters.
- Requested sealing has not been granted, leaving federal equities exposed on the state court docket.

Despite repeated requests, the Knox County Criminal Court has not acted to seal or secure these materials, resulting in an ongoing national security risk that cannot be remedied at the state level.

WHY YOUNGER ABSTENTION DOES NOT APPLY

This matter exceeds the threshold for abstention under *Younger v. Harris*, 401 U.S. 37 (1971). While state criminal proceedings remain pending, multiple factors remove this case from *Younger* protection. Because these elements are present, federal intervention falls squarely within the established exceptions to *Younger* abstention. Intervention here is not only permissible but necessary to protect federal equities, safeguard constitutional rights, and prevent further misuse of DOJ-controlled materials.

1. **Bad Faith and Harassment** – State officials submitted falsified affidavits, concealed body-worn camera evidence, and used uncertified personnel during an armed raid. These actions demonstrate intentional misconduct, not good-faith prosecution.
2. **Extraordinary Circumstances** – Sensitive federal equities were compromised, including FBI FISUR surveillance logs, “National Threat Band II” designations, and Rule 6(e) grand jury content. These materials are outside state jurisdiction and require federal containment.
3. **Irreparable Injury** – The public dissemination of federal national-security designations tied to Plaintiff and his business causes ongoing reputational, legal, and constitutional harm that cannot be remedied through state appeals.
4. **No Adequate State Remedy** – State courts cannot regulate federal grand jury secrecy, FBI surveillance classification, or DOJ internal protocols. Nor can they investigate the misconduct of federally-deputized personnel such as Task Force Officer John Sharp.

REQUESTED ACTION

I respectfully request that the U.S. Attorney's Office for the Eastern District of Tennessee take the following actions without delay:

1. **Open a formal criminal investigation** into the misuse of federal equities and associated misconduct including but not limited to; grand jury testimony, falsified affidavits, service reports, suppression of exculpatory evidence, unlawful dissemination of federal investigative materials and use of uncertified personnel.
2. **Immediately secure and seal all federal equities** presently exposed in Knox County court filings, including unredacted FISUR surveillance logs, FD-302 reports, Rule 6(e) grand jury content, SSG personnel names, and identifiers. These equities fall under federal jurisdiction and cannot remain in the public domain.
3. **Conduct a national security review** of the compromised SSG and FBI identifiers to assess potential risks to personnel safety and ongoing federal operations.
4. **Review the conduct of federally-deputized officers** (including Task Force Officer John Sharp) for dual-role conflicts, misuse of federal authority, and improper participation in state proceedings.
5. **Investigate criminal and civil rights violations** including but not limited to the items cited herein.
6. **Recognize and protect my status as a whistleblower**, based on my good-faith disclosures to DOJ and FBI regarding the unlawful dissemination and exposure of federal investigative materials ensuring protection consistent with DOJ whistleblower protocols and constitutional safeguards against retaliation additional malicious acts.
7. **Recognize my role as a cooperating witness** in these matters, given my direct participation in the events at issue and my authorship of detailed case overviews, exhibit summaries, and motions documenting misconduct. My testimony and compiled materials are necessary to ensure that federal equities are fully protected and that the Department has the benefit of complete, first-hand knowledge of the misconduct at issue.
8. **Refer matters of internal misconduct** to the DOJ Office of Professional Responsibility and Office of Inspector General for independent review and accountability.

Failure to act will leave SSG personnel identities, FBI program identifiers, and Rule 6(e) grand jury content unsealed in public state records; a direct breach of federal secrecy law that places lives at risk and undermines the integrity of the Department of Justice itself.

Because these equities remain exposed, and with state hearings scheduled in the near term, I respectfully request expedited federal action and confirmation. The Eastern District of Tennessee is uniquely positioned to secure these materials, investigate the fraud and misconduct surrounding their misuse, and ensure protection for whistleblowers and cooperating witnesses who have reported these violations in good faith.

The documented record demonstrates that this is not a matter of local error, but of continuing federal concern. The duty to protect federal equities, safeguard constitutional rights, and uphold the integrity of grand jury secrecy rests squarely with your office.

Respectfully submitted,
Edward C. Browder