

AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California

LODGED
CLERK, U.S. DISTRICT COURT
08/11/21
CENTRAL DISTRICT OF CALIFORNIA
BY: JBB DEPUTY

FILED
CLERK, U.S. DISTRICT COURT
AUG 11 2021
CENTRAL DISTRICT OF CALIFORNIA
BY: CA DEPUTY

United States of America

v.

MATTHEW TAYLOR COLEMAN,

Defendant.

Case No. 2:21-mj-03722

CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS

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 of August 9, 2021, outside the United States and within the jurisdiction of the Country of Mexico, the defendant violated:

Code Section

Offense Description

18 U.S.C. §§ 1119, 1111

Foreign Murder of U.S. Nationals

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

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Complainant's signature

Jennifer Bannon, Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: August 11, 2021

Jacqui Chooljian
Judge's signature

City and state: Los Angeles, California

Hon. Jacqueline Chooljian, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Jennifer Bannon, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI") and have been so employed since 2006. Since 2006, I have participated in numerous counter-terrorism investigations that focused on large networks of terrorist sympathizers and supporters residing in the United States and abroad.

2. In July 2011, I was assigned to work on the Regional Narcotics Suppression Program, a federally-funded High Intensity Drug Trafficking Area task force that consists of the FBI, the Drug Enforcement Administration, the Orange County Sheriff's Department, the Santa Ana Police Department, and several other local police departments. RNSP is responsible for working crimes committed by Drug Trafficking Organizations, under Titles 18 and 21 of the United States Code. I have received training in asset forfeiture, cellular phone analysis, investigating complex narcotics organizations, and advanced interviewing and interrogation techniques. In July 2018, I was transferred to the FBI Ventura Resident Agency where I continue to investigate drug trafficking, money laundering investigations, violent crimes and transnational criminal organizations. Additionally, I have participated in numerous search and arrest warrants associated with individuals who were involved in violent criminal acts.

3. Additionally, I have participated in numerous search and arrest warrants associated with individuals who were involved in violent criminal acts. I have participated in an investigation involving an international kidnapping of a United States national abroad.

4. Through my investigations, my training and experience, and my conversations with other law enforcement personnel, I have received both formal and informal instruction in investigating violent acts, to include methods and techniques used by criminals to plan, execute, and cover-up their criminal activities. Specifically, I have spoken with, and read reports from agents involved in investigating murders of US national in foreign countries.

II. PURPOSE OF AFFIDAVIT

5. This affidavit is made in support of criminal complaint against MATTHEW TAYLOR COLEMAN ("M. COLEMAN") for a violation of 18 U.S.C. §§ 1119, 1111: Foreign Murder of United States Nationals (the "SUBJECT OFFENSE").

6. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel, including the Santa Barbara Police Department ("SBPD") and the Secretaria de Seguridad Publica Municipal de Rosarito ("SSPM Rosarito"), and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and warrants and does not purport to set forth all my knowledge of the investigation into this matter.

Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only and all dates and times are approximate.

III. SUMMARY OF PROBABLE CAUSE

7. On August 7, 2021, M. COLEMAN took his two children, R.C. (10 months old) and K.C. (two years old), from the home he shared with his wife and mother of his children, A.C., in Santa Barbara, California to Rosarito, Baja California, Mexico. While in Rosarito, M. COLEMAN murdered his children by shooting a spear fishing gun into their chests. On August 9, 2021, during a Mirandized interview, M. COLEMAN confessed to the murders.

IV. STATEMENT OF PROBABLE CAUSE

A. A.C. Reported M. COLEMAN Missing

8. On August 9, 2021, SBPD Sgt. Brian Larson contacted me regarding a possible parental kidnapping. Sgt. Larson provided me with a copy of a missing person police report that was taken by SBPD. I reviewed the police report and learned the following:

a. On August 7, 2021, SBPD Officer Barriga spoke to A.C. via telephone regarding her husband, M. COLEMAN. A.C. reported to SBPD that she, her husband, M. COLEMAN, and their two children, R.C. and K.C. planned to go on a camping trip. Instead, A.C. said that instead M. COLEMAN had left the residence in the family's Mercedes Sprinter van with R.C. and K.C. A.C. reported that M. COLEMAN did not tell her where he was going and was not answering her text messages. In addition, A.C. was concerned because M. COLEMAN did not have a car seat.

b. A.C. asked the officer to contact M. COLEMAN via telephone. A.C. further stated she did not believe that M. COLEMAN would harm her children, nor did she believe her children were in any danger. A.C. told the officer that she was not in any danger and believed M. COLEMAN would eventually return to their residence. The officer attempted to contact M. COLEMAN via telephone, but received no response. The officer offered to meet A.C. in person. A.C. declined and requested no further assistance.

c. On August 8, 2021, A.C. called SBPD to follow up on the previous day's report. At approximately 6:59 p.m., SBPD Officer Michael Chung responded to A.C.'s residence in Santa Barbara and met with A.C. A.C. reiterated that on August 7, 2021 her husband, M. COLEMAN left the residence with their two children in the Mercedes Sprinter van. A.C. requested SBPD's assistance in reporting M. COLEMAN and their two children missing. A.C. reported that she did not have any problems with M. COLEMAN and they did not have any sort of argument prior to him leaving. Family members reported that they were unable to telephonically reach M. COLEMAN.

d. Officer Chung asked A.C. whether she could attempt to use the "Find My iPhone" application to locate M. COLEMAN's phone. A.C. agreed and turned on her laptop, which showed that M. COLEMAN's last known location was at Pabellon Rosarito in Rosarito, Baja California, Mexico at approximately 2:24 p.m. According to an open source query, Pabellon Rosarito was an open-air shopping center with an address of Calle Reforma

#300 Parcelas, 22710 Rosarito B.C Reforma, Escenica Tijuana-Ensenada 300, 22710 Rosarito, B.C., Mexico.

9. On August 9, 2021, Sgt. Larson provided me with a photograph of M. COLEMAN with his children, R.C and K.C.

B. M. COLEMAN was Located Returning from Mexico

10. On August 9, 2021, Sgt. Larson sent me a screenshot showing where M. COLEMAN's cellular telephone was located, using the Find My iPhone app. I saw that it was in Mexico, near the San Ysidro Port of Entry ("SYPOE"). I contacted the FBI in San Diego, CA, and requested their assistance in conducting an interview of M. COLEMAN upon his entry into the United States and to determine the welfare of the children.

11. At approximately 1:00 pm, M. COLEMAN arrived at the SYPOE in the Mercedes Sprinter van. M. COLEMAN was referred to Secondary Inspection. There were no other occupants in the Mercedes Sprinter van. Federal Agents took custody of the Mercedes Sprinter van. During an initial inspection of the Mercedes van, I was informed that Customs and Border Protection ("CBP") officers observed what appeared to be blood on the Mercedes Sprinter van's registration paperwork.

C. R.C. and K.C.'s Bodies are Found

12. FBI Supervisory Special Agent ("SSA") Joyce Deniz told me that when she learned that M. COLEMAN was not accompanied by his children, she contacted her Mexican liaison partners from SSPM, informing them of two missing children. After she provided the SSPM Rosarito with the ages of the children, an SSPM Rosarito officer informed her that the SSPM Rosarito

located two deceased children matching R.C. and K.C.'s descriptions at approximately 8:00 a.m. that morning (August 9, 2021) in a ditch. I reviewed photographs of the deceased children and observed large puncture wounds in their chest cavities. The photos of the two children provided by Mexican authorities appeared to be the same children depicted in a photograph of the children with M. COLEMAN previously provided.

13. M. COLEMAN was taken into an interview room at the SYPOE. FBI SA Nathaniel Dingle provided M. COLEMAN his Miranda Rights. M. COLEMAN waived his rights and agreed to speak with the agents. The interview was recorded.

14. At the conclusion of the interview, I met with SA Dingle, who told me the following:

a. M. COLEMAN confessed to killing his children, R.C. and K.C. M. COLEMAN said that he drove his children to Mexico on Saturday, August 7, 2021. Because he did not have a car seat, he placed his youngest child, R.C., in a box and departed without A.C. M. COLEMAN stated that he believed his children were going to grow into monsters so he had to kill them. At approximately 5:00 a.m., M. COLEMAN drove south on Descanso Road. He pulled off to the side of a road in the area of Rancho Del Cielo. M. COLEMAN stated that first he killed R.C., using a spear fishing gun piercing R.C. in the heart. M. COLEMAN stated that K.C. did not die right away. M. COLEMAN described that he had to move the spear around, thereby cutting his hand in the process. I later observed marks on M. COLEMAN's hand, consistent with his statement. Photographs showing those

marks were taken. After he killed his children, M. COLEMAN said that he moved their bodies approximately 30 yards away and placed them in some brush. M. COLEMAN provided agents with the approximate location of the bodies, which coincided with where the bodies were located by Mexican Authorities. M. COLEMAN stated that he drove a couple of miles where he then discarded the spear fishing gun and bloody clothes near a creek. He threw bloody clothes into a blue trash bin somewhere off the side of a road in Tijuana, Mexico.

b. M. COLEMAN explained that he was enlightened by QAnon and Illuminati conspiracy theories and was receiving visions and signs revealing that his wife, A.C., possessed serpent DNA and had passed it onto his children. M. COLEMAN said that he was saving the world from monsters.

c. M. COLEMAN identified photographs depicting R.C. and K.C.'s bodies as recovered by the Mexican authorities as his children. M. COLEMAN marked each photograph with his initials.

d. M. COLEMAN was asked whether he knew what he did was wrong. M. COLEMAN stated that he knew it was wrong, but it was the only course of action that would save the world.

15. At approximately 2:30 a.m. on August 10, 2021, I transported M. COLEMAN from the SYPOE to the Santa Ana jail. While being booked into custody, the jailer asked M. COLEMAN why he had a band-aid on his hand. He said it was from "hurting his children."

D. Murder Weapon and Bloody Clothes Found

16. On August 10, 2021, FBI personnel informed me that Mexican officials recovered the murder weapon, bloody clothes, and a baby's blanket. I reviewed photographs of these items.

E. M. COLEMAN is, and R.C. and K.C. were, Nationals of the United States

17. When detained at the SYPOE, M. COLEMAN was in possession of his United States passport, which identified M. COLEMAN as a United States citizen.

18. I have reviewed records from Customs and Border Protection and identified a United States passport for A. C. under her maiden name. I believe that she is a United States citizen. I am also in possession of a copy of K.C.'s birth certificate, as well as a "Verification of Pregnancy and Live Birth" listing their home address in Santa Barbara, California, (signifying a home birth) regarding R.C., signed by the birthing nurse. Given these documents, and that the Colemans are United States citizens, reside in Santa Barbara, California, coupled with K.C.'s and R.C.'s young ages (two years old and 10 months), I believe that there is probable cause to believe that K.C. and R.C. were United States nationals.

F. Authorization for Prosecution by the United States

19. I am informed by the United States Attorney's Office that the Attorney General, in consultation with the Secretary of State, must approve prosecutions involving the SUBJECT OFFENSE. On August 11, 2021, I was informed that the Attorney General of the United States, by and through his delegation of authority to

the Assistant Attorney General for the Criminal Division of the Department of Justice, provided approval for this complaint charging M. COLEMAN with 18 U.S.C. §§ 1119, 1111.

V. CONCLUSION

20. For all the reasons described above, there is probable cause to believe that M. COLEMAN committed a violation of 18 U.S.C. §§ 1119, 1111.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 11th day of August 11, 2021.



HONORABLE JACQUELINE CHOOLJIAN
UNITED STATES MAGISTRATE JUDGE