

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

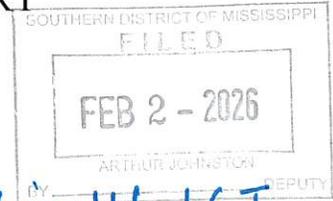
United States of America)

v.)

John S. Andrews)

Case No.)

3:26mj 116-LGI



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 March 21, 2025 in the county of Yazoo in the Southern District of Mississippi, the defendant(s) violated:

Code Section 18 U.S.C. § 1111 Offense Description Murder in the Second Degree

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference.

[X] Continued on the attached sheet.

Samuel Casey Fleming Complainant's signature

Samuel Casey Fleming, FBI Special Agent Printed name and title

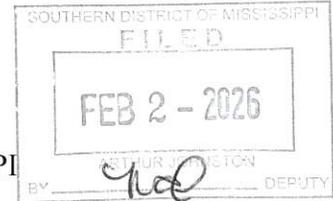
Sworn to before me and signed in my presence.

Date: 2/2/2026

LaKeysha Greer Isaac Judge's signature

City and state: Jackson, Mississippi

LaKeysha Greer Isaac, Magistrate Judge Printed name and title



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

IN THE MATTER OF THE CRIMINAL
COMPLAINT OF JOHN S. ANDREWS

Case No. 3:26mj116-LGI

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Samuel Casey Fleming, being duly sworn, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I, Samuel Casey Fleming, am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. Affiant is currently employed by the Federal Bureau of Investigation (FBI), assigned to investigate Violent Crime and assist the Safe Streets and Gang Task Force, in the Little Rock Field Office/Texarkana RA. Before transferring to the Little Rock Field Office/Texarkana RA, I was stationed in Jackson, Mississippi as a Special Agent (SA). I have been employed by the FBI since January 2024. As a Special Agent, I have investigated numerous criminal matters relating to offenses that relate to kidnapping, assaults, murder, business robberies, and the distribution of controlled substances or are inherently violent in nature. Prior to my assignment to the Jackson Division, I received training in conducting investigations at the FBI training facility in Quantico, Virginia, and have personally conducted investigations of this nature. I have been assigned to the Violent Crime Squad since June 2024.

3. Prior to joining the FBI, I obtained law enforcement training and experience as a police officer for Ashdown, Arkansas Police Department for 8 years. Throughout my law enforcement career, I have conducted several investigations relating to the distribution of controlled substances and firearms and conducting safety measures for the citizens of Ashdown, Arkansas, while carrying out the duties of a certified law enforcement officer.

4. My current duties on the Violent Crime Squad include but are not limited to investigating violent offenses committed by individuals. I have participated in numerous controlled substance investigations, during which I have conducted or participated in; physical and wire surveillances, the execution of search warrants, debriefing of informants, controlled purchases, and reviews of taped conversations. I have also been the affiant for search warrants and arrest warrants.

5. I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts, discussion with correctional enforcement officials, other investigative activities conducted, and evidence obtained during the investigation.

6. I make this affidavit in support of an application for issuance of a criminal complaint and arrest warrant for John S. Andrews (ANDREWS herein), presently located at the Yazoo City Federal Correctional Complex ("FCC"), 2225 Haley Barbour Parkway, Yazoo City, Mississippi for violation of Title 18, United States Code, Section 1111 (murder). The affidavit does not include all facts known to me but rather contains facts sufficient to support probable cause for the issuance of an arrest warrant.

STATEMENT OF FACTS

7. On March 22, 2025, at about 8:29 a.m., while conducting routine checks of cells containing inmates, Correctional Officer Jimmy Barton of Yazoo City FCC observed inmate Christopher Eric Shoemake (SHOEMAKE herein) lying unresponsive in a pool of blood and urine on the floor inside cell 130. Cell 130 contained only SHOEMAKE and inmate ANDREWS. Barton declared a medical emergency. Several members of the prison staff responded, including two registered nurses. Upon opening the cell, prison staff placed ANDREWS in restraints and removed SHOEMAKE from the cell and rendered aid. SHOEMAKE was taken to Yazoo City FCC's medical trauma room. According to the registered nurses, cell 130 contained a tremendous amount of blood where SHOEMAKE was found, SHOEMAKE's eyes were bulging beneath his eyelids, and injuries existed all over SHOEMAKE's head. SHOEMAKE was transported by Life Flight to University Mississippi Medical Center in Jackson, Mississippi. SHOEMAKE was placed on life support but succumbed to his injuries on March 23, 2025.

8. On March 24, 2025, Federal Bureau of Investigation (FBI) Task Force Officer (TFO) Scott Albrecht and I (Affiant hereinafter) responded to FCC Yazoo City. TFO Albrecht and Affiant interviewed inmate ANDREWS after providing ANDREWS the warnings pursuant to *Miranda*. Yazoo City FCC did not have an interview room available, therefore the interview was conducted in an empty storage room. During the interview, ANDREWS stated that SHOEMAKE previously smoked a drug that ANDREWS referenced as K2, that ANDREWS stated is supposed to be similar to marijuana but affects people differently. ANDREWS stated he was awakened by the sounds of SHOEMAKE banging his, that is, SHOEMAKE's, own head against the cell floor and toilet.

9. After the interview, TFO Albrecht and Affiant were notified of a video found by BOP investigators. The video was recorded by a surveillance camera outside cell 130, but events inside cell 130 can be observed through the cell's door window. The events captured on the video occur on the night of March 21, 2025, after 10:20 p.m., when both ANDREWS and SHOEMAKE were locked in the cell for the night. The video shows SHOEMAKE fall to the floor inside cell 130 and ANDREWS stomping SHOEMAKE with ANDREWS' feet. The video shows ANDREWS placing an orange jacket over SHOEMAKE before ANDREWS stomped SHOEMAKE. The video shows ANDREWS stomps SHOEMAKE for several minutes. ANDREWS is not observed in the video again after he stops stomping, or striking, SHOEMAKE.

10. SHOEMAKE was not discovered until the following morning (March 22) at about 8:00 a.m. by Barton. Barton told Affiant that he (Barton) was conducting cell checks at about 8:00 a.m. on March 22 and when he arrived at cell 130, ANDREWS was standing in the cell. According to Barton, ANDREWS was standing and made an eye movement that directed Barton to SHOEMAKE lying on the floor. Barton stated that he retrieved his radio and called for the medical emergency.

11. An autopsy was conducted of SHOEMAKE. According to a pathologist's report, SHOEMAKE's skull was fractured behind his eye socket and hemorrhaging existed on both sides of SHOEMAKE's brain; substantial bruising existed to his brain in several locations. These are in addition to other injuries documented in the report. The report further states the injuries SHOEMAKE sustained are consistent with types of blunt force trauma including hands, feet, or a blunt object. The report concludes the cause of death is blunt head trauma and manner of death is homicide.

CONCLUSION.

Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that JOHN S ANDREWS committed murder, in violation of 18 U.S.C. § 1111.



Samuel Casey Fleming, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on this 2nd day of February 2026.



LAKEYSHA GREER ISAAC
United States Magistrate Judge