

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 4:23-CR-163
 :
v. :
 : (Chief Judge Brann)
JEREMY PAULEY, :
Defendant. : (electronically filed)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
18 U.S.C. § 371
(Conspiracy)

I. Background

At times material to the Information:

A. Relevant Individuals and Entities

1. JEREMY PAULEY resided in Enola, Pennsylvania, and Bloomsburg, Pennsylvania, both within the Middle District of Pennsylvania.

2. The University of Arkansas for Medical Sciences (UAMS) was both a hospital and a health sciences university located in Little Rock, Arkansas.

3. Harvard Medical School (“HMS”) was the graduate medical

school of Harvard University, a private, non-profit educational institution located in Boston, Massachusetts.

4. PayPal was an American financial technology company headquartered in San Jose, California. PayPal's services allow users to transfer money electronically.

5. Business 1 was a Class B, C, and D mortuary located in Little Rock, Arkansas, and offered transportation, embalming, and cremation services to commercial entities, including hospitals and funeral homes.

6. Candace Chapman Scott was a resident of Little Rock, Arkansas.

7. Scott was employed at Business 1, and her job duties included transportation, cremation, and embalming of human remains.

8. Cedric Lodge resided in Goffstown, New Hampshire, and was employed by Harvard Medical School as the Morgue Manager.

9. Denise Lodge was married to Cedric Lodge and resided in Goffstown, New Hampshire.

10. Katrina Maclean resided in Salem, Massachusetts.

11. Joshua Taylor resided in West Lawn, Pennsylvania.

12. Mathew Lampi resided in East Bethel, Minnesota.

B. UAMS Anatomical Gift Program Operations

13. UAMS's College of Medicine had an anatomy lab that received cadavers through the Anatomical Gift Program. Through that program, donors could gift their body after death to UAMS's Department of Neurobiology and Developmental Sciences to be used specifically for medical education, teaching, and research.

14. After use, donated cadavers were to be cremated and then returned to UAMS for final disposition.

15. At all times, donated cadavers were the sole property of UAMS.

16. In 2014, UAMS contracted with Business 1 for cremation services.

17. The cremation services specifications, in part, required Business 1 "to provide individual containers for human remains, remove 2-4 containers from the UAMS campus per trip[,] transport remains to crematory, provide cremation and return cremains in

suitable, identifiable, individual containers to UAMS within 72 hours from date of cremation.”

18. The term “cremains” means the ashes of a cremated human body.

19. Business 2 is a funeral home located in Little Rock, Arkansas, that provides funeral and burial services. Business 2 used the cremation services of Business 1.

20. Employees of Business 1 were not permitted to remove, keep, or sell any human remains, in whole or in part, belonging to a donated cadaver.

C. Harvard Medical School Morgue Operations

21. HMS utilized donated human cadavers in the regular course of medical education, teaching, and research.

22. Cadavers were voluntarily donated by individuals who completed an agreement with HMS through the Anatomical Gifts Program.

23. When HMS was finished using the donated cadavers, the donor’s remains were typically cremated and were either returned to

the donor's family or laid to rest in a cemetery in Tewksbury, Massachusetts, maintained for that purpose.

24. Donors may have elected to specify the final disposition of their remains as part of their donation agreement. If a donor had specified that their remains should be returned to their next of kin after cremation, HMS turned over the donor's cremains to the specified family member.

25. HMS maintained an onsite morgue facility where donated cadavers were stored until used for education, teaching, or research purposes, and again when the school was finished with the cadaver to await final disposition.

26. Harvard Medical School documented the identities of donated cadavers and maintained a database and records associated with each cadaver. HMS assigned each donated body an identification number and identification tags were affixed to the body and the bag in which it was stored. In preparation for final disposition, Harvard Medical School employees, including the Morgue Manager, confirmed the identity of each cadaver prior to cremation by viewing any

identifying marks, if still visible, and assigned identification number.

27. Employees of Harvard Medical School were not permitted to remove, keep, or sell any human remains, in whole or in part, belonging to a donated cadaver.

28. At all times, donated cadavers in the possession of HMS were the sole property of HMS.

II. The Conspiracy and its Objects

29. From in or about 2018, the exact date being unknown to the United States, and continuing thereafter until in or about August 2022, in the Middle District of Pennsylvania, and elsewhere, the defendant,

JEREMY PAULEY,

knowingly, intentionally and willfully conspired, combined, confederated, and agreed with Candace Chapman Scott, Katrina Maclean, Joshua Taylor, Mathew Lampi, Cedric Lodge, and other persons both known and unknown to the United States, to unlawfully transport, transmit, and transfer, and cause to be transported, transmitted, and transferred in interstate commerce from Boston, Massachusetts; Goffstown, New Hampshire; and Little Rock, Arkansas,

to Pennsylvania, and from Pennsylvania to Minnesota and elsewhere, stolen goods, wares and merchandise, that is, human remains, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

30. The object of the conspiracy was for the conspirators to profit from the interstate shipment, purchase, and sale of stolen human remains.

III. Manner and Means

The object of the conspiracy was accomplished, in part, by the following manner and means:

31. Cedric Lodge was employed as Morgue Manager at Harvard Medical School and, as such, had access to the morgue and the donated cadavers stored in the morgue.

32. At times, Cedric Lodge stole dissected portions of donated cadavers, including, for example, heads, brains, skin, bones, and other human remains, without the knowledge or permission of HMS, and removed those remains from the morgue in Massachusetts and

transported them to his residence in New Hampshire.

33. Cedric Lodge and Denise Lodge communicated with others, including Katrina Maclean and Joshua Taylor, through internet social media websites and cellular telephones.

34. Cedric Lodge and Denise Lodge sold stolen human remains to Katrina Maclean, Joshua Taylor, and others, and sometimes shipped those remains through the United States Postal Service, to Pennsylvania and elsewhere.

35. At times, Cedric Lodge used his access to the morgue to allow Katrina Maclean and Joshua Taylor to enter the morgue and choose what remains to purchase, after which, Cedric Lodge, Katrina Maclean, or Joshua Taylor would remove the stolen remains and transport them elsewhere.

36. Katrina Maclean sold human remains stolen in this manner to buyers in multiple states, including JEREMY PAULEY, in the Middle District of Pennsylvania, and shipped or transported the stolen human remains to those buyers.

37. Joshua Taylor bought and caused stolen human remains to

be shipped to him in Pennsylvania from New Hampshire, transported stolen human remains from Massachusetts to Pennsylvania, and sold and shipped stolen human remains to buyers, including JEREMY PAULEY, in the Middle District of Pennsylvania.

38. Candace Chapman Scott stole human remains from Business 1 in Little Rock, Arkansas, without the knowledge or permission of Business 1 or any client of Business 1, including UAMS and Business 2, and sold and shipped them to JEREMY PAULEY in the Middle District of Pennsylvania.

39. Stolen human remains sold and shipped in interstate commerce by the co-conspirators included bones, skulls, skin, dissected faces and heads, internal organs (often referred to by various co-conspirators as “wets” or “wet specimens”), including brains, lungs, and others, and whole stillborn corpses.

40. JEREMY PAULEY sold and shipped stolen human remains he had purchased from Katrina Maclean, Joshua Taylor, and Candace Chapman Scott to buyers in various states, including Mathew Lampi in Minnesota.

41. At times, JEREMY PAULEY purchased human remains from Mathew Lampi or received human remains from Mathew Lampi in trade for other human remains.

IV. Overt Acts

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Middle District of Pennsylvania and elsewhere:

42. In or about June and July 2021, Katrina Maclean, in Massachusetts, shipped human skin to JEREMY PAULEY, in Pennsylvania, and engaged his services to tan the skin to create leather.

43. On or about July 31, 2021, PAULEY sent a photograph of the leather and Maclean agreed to provide PAULEY with human skin in lieu of monetary payment. Katrina Maclean then contacted Cedric Lodge and inquired about obtaining human skin to send to “the dude I sent the chest piece to tan.” Cedric Lodge agreed to look for skin at HMS for Maclean to send to PAULEY.

44. On or about August 15, 2021, JEREMY PAULEY shipped the tanned human skin from the Middle District of Pennsylvania to Katrina Maclean in Massachusetts.

45. On or about September 20, 2021, Maclean shipped human skin from Massachusetts to JEREMY PAULEY in the Middle District of Pennsylvania, in payment for his services. A few days later, Maclean contacted PAULEY to confirm the shipment arrived because she “wanted to make sure it got to you and I don’t expect agents at my door.”

46. On or about October 19, 2021, JEREMY PAULEY transferred \$8,800 in United States currency to Katrina Maclean via PayPal in payment for stolen human remains.

47. On or about October 28, 2021, UAMS transferred three cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

48. On or about October 28, 2021, Scott sent JEREMY PAULEY a message through Facebook stating “I follow your page and work and

LOVE it. I'm a mortician and work at a trade service mortuary, so we are contracted through the medical hospital here in Little Rock to cremate their cadavers when the medical students are done with them before they discard them in a cremation garden. Just out of curiosity, would you know anyone in the market for a fully in tact [sic], embalmed brain?"

49. On or about October 28, 2021, Scott sent JEREMY PAULEY a message through Facebook stating, "I actually just looked and I have 2 embalmed with skull cap." JEREMY PAULEY instructed Scott how to package the parts.

50. On or about October 28, 2021, Scott sent JEREMY PAULEY pictures through Facebook messenger of a heart and another organ. JEREMY PAULEY responded he was interested in the brains and heart. Scott then asked, "would \$1200 shipped sound reasonable for all 3 pieces including skull caps?" JEREMY PAULEY responded, "you are literally on the same page because that was going to be my offer lol!"

51. On or about October 29, 2021, JEREMY PAULEY paid Scott \$1,200 through PayPal.

52. On or about October 31, 2021, Scott agreed to sell human skin, a skull, a brain, and a heart to JEREMY PAULEY for \$700.00, and JEREMY PAULEY requested that Scott invoice him in the amount of \$800.00 to cover fees and shipping.

53. On or about October 31, 2021, JEREMY PAULEY sent \$800.00 through PayPal to Scott.

54. On or about November 2, 2021, Scott shipped four packages of human remains through the United States Postal Service (USPS) from Arkansas to JEREMY PAULEY in Enola, Pennsylvania.

55. Between on or about November 3, 2021, and November 10, 2021, UAMS transferred four cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be transported in whole back to UAMS.

56. On or about November 11, 2021, Scott agreed to sell a brain, skullcap, and ear to JEREMY PAULEY for \$250.00. Scott took photographs of the remains packaged in her apartment and sent photographs through Facebook Messenger to JEREMY PAULEY.

57. On or about November 11, 2021, JEREMY PAULEY paid

Scott \$250 through PayPal.

58. On or about November 12, 2021, Scott shipped one package containing human remains through the USPS from Arkansas to JEREMY PAULEY in Enola, Pennsylvania.

59. On or about November 17, 2021, Scott informed JEREMY PAULEY through Facebook messenger that she should be getting more embalmed bodies soon since the semester was over.

60. Between on or about December 2, 2021, through December 7, 2021, UAMS transferred 12 cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be transported in whole back to UAMS.

61. On or about December 6, 2021, Scott and JEREMY PAULEY negotiated a sale of “2 brains, one with skullcap, 3 hearts one cut, 2 fake boobies, one large belly button piece of skin, one arm, one huge piece of skin, and one lung.” Scott took photos of each body part inside her apartment and sent the photos through Facebook to JEREMY PAULEY. Scott agreed to sell the body parts to JEREMY PAULEY for \$1,600.

62. On or about December 6, 2021, JEREMY PAULEY paid Scott \$1,600.00 through PayPal.

63. On or about December 7, 2021, JEREMY PAULEY paid Scott \$300.00 through PayPal.

64. On or about December 7, 2021, JEREMY PAULEY notified Mathew Lampi that he had hearts and brains coming. JEREMY PAULEY sent Mathew Lampi photographs that Candace Chapman Scott had sent PAULEY depicting Chapman Scott displaying human remains in her apartment. Mathew Lampi agreed to purchase three items for \$4,000. JEREMY PAULEY stated, "Deal! Soon as it all gets here I'll wrap it up and send it out!"

65. On or about December 8, 2021, UAMS transferred four cadavers donated through the Anatomical Gift Program to Business 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

66. On or about December 8, 2021, Scott and JEREMY PAULEY negotiated a sale of "7 huge pieces of skin, 2 large pieces of skin with tiddy, 4 brains one with skull cap, 1 lung, one penis, 2 testicles, and 3

hearts,” with an agreed upon price of \$2,000.00.

67. On or about December 8, 2021, JEREMY PAULEY paid Scott \$500 through PayPal.

68. On or about December 8, 2021, JEREMY PAULEY sent Mathew Lampi a photograph of human remains and told Lampi it included “Four more brains, three hearts, a perfect ling [sic], penis, and a set of testicles.”

69. On or about December 10, 2021, Scott took pictures of nine boxes packaged for mailing in her apartment and sent the photos to JEREMY PAULEY through Facebook Messenger.

70. On or about December 10, 2021, Scott shipped four boxes containing human remains from Arkansas through USPS to JEREMY PAULEY in Enola, Pennsylvania.

71. On or about December 12, 2021, Mathew Lampi asked JEREMY PAULEY for an “update on parts?” JEREMY PAULEY responded “Some say Monday delivery, some say Thursday delivery. IF things show up on time with how the mail has been lol!”

72. On or about December 13, 2021, Scott shipped five boxes

containing human remains from Arkansas through USPS to JEREMY PAULEY in Enola, Pennsylvania.

73. On or about December 13, 2021, JEREMY PAULEY paid Scott \$175.00 through PayPal for shipping the remains.

74. On or about December 14, 2021, JEREMY PAULEY notified Mathew Lampi that he was “Going to pack up your brain and heart tonight, arm isn’t here yet but I’ll send it out soon as it arrives!” JEREMY PAULEY sent Mathew Lampi a photograph of a USPS barcode with tracking number and the message, “All set to head out tomorrow!” Mathew Lampi responded, “Nice! Parts correct?” “Brain and heart you! Will send arm soon as the rest of the packages arrive.”

75. On or about December 14, 2021, Scott informed JEREMY PAULEY through Facebook Messenger that she had “2 fully intact brains” and agreed to sell them to him for \$250.00.

76. On or about December 14, 2021, Scott informed JEREMY PAULEY through Facebook Messenger that she had “2 hearts, 1 brain w/skullcap,” and agreed to sell them to him for \$350.00.

77. On or about December 14, 2021, JEREMY PAULEY paid

Scott \$350.00 through PayPal.

78. On or about December 15, 2021, JEREMY PAULEY paid Scott \$250.00 and \$1,500.00 through PayPal.

79. On or about December 15, 2021, Scott shipped one box containing human remains through USPS from Arkansas to JEREMY PAULEY in Enola, Pennsylvania.

80. On or about December 15, 2021, Scott asked JEREMY PAULEY through Facebook Messenger if he would be interested in purchasing a fetus. JEREMY PAULEY instructed Scott how to package a fetus.

81. On or about December 16, 2021, JEREMY PAULEY paid Scott \$350.00 and \$1,100.00 through PayPal.

82. On or about December 31, 2021, Scott shipped JEREMY PAULEY one box containing human remains through USPS from Arkansas to JEREMY PAULEY in Enola, Pennsylvania.

83. In or about February 2022, D.S., an Arkansas resident, gave birth to a stillborn baby boy, whom she named Lux. On or about February 5, 2022, Business 2 was authorized to dispose of Lux's

remains by means of cremation. On or about February 9, 2022, Business 2 transferred Lux's body to Business 1 for cremation. After cremation, the fetal cremains were to be returned in whole to Business 2 so they could be turned over to D.S.

84. On or about February 9, 2022, Candace Chapman Scott stole Lux's remains, without the knowledge or permission of Business 1, Business 2, nor D.S., and agreed to sell his remains to JEREMY PAULEY in exchange for \$300. Scott took photos of Lux's remains and sent the photos to JEREMY PAULEY through Facebook Messenger. JEREMY PAULEY paid Scott \$300 through PayPal.

85. On or about February 10, 2022, a burial-transit/cremation permit record was signed by a representative of Business 1, asserting the fetal remains it received from Business 2 had been cremated. D.S. was later provided with cremains of unknown origin, purported to be the cremains of her son, Lux.

86. On or about February 16, 2022, Chapman-Scott shipped Lux's remains to JEREMY PAULEY in Enola, Pennsylvania.

87. On or about February 27, 2022, JEREMY PAULEY agreed to trade Lux's remains to Mathew Lampi, along with \$1,550, in exchange for five human skulls.

88. On or about February 28, 2022, JEREMY PAULEY shipped a package bearing tracking number ending 0123 26 from Enola Pennsylvania to Mathew Lampi's residence in East Bethel, Minnesota.

89. On or about April 17, 2022, Mathew Lampi sent JEREMY PAULEY a text message through the internet application WhatsApp, stating, "when are wets next month?" JEREMY PAULEY replied "Not sure on exact date. She just lets me know when they start cremating the medical cadavers from the semester and packs up boxes for me. But it's always a shit ton[.]" Mathew Lampi responded, "Cool I want faces as we spoke about other stuff too[.]"

90. On or about May 9, 2022, UAMS transferred one cadaver donated through the Anatomical Gift Program to BUSINESS 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

91. On or about May 11, 2022, Scott informed JEREMY

PAULEY through Facebook Messenger that she received a liver and a heart “cut in half.”

92. On or about May 13, 2022, Scott informed JEREMY PAULEY through Facebook Messenger that she received a “1/2 a brain, 2 smokers lungs, one lower chunk of pubic skin with peen and sack attached, 2 larger pieces of skin, one small piece with nip,” and agreed to sell them to JEREMY PAULEY for \$850.00.

93. On or about May 13, 2022, JEREMY PAULEY paid Scott \$850.00 through PayPal.

94. On or about May 27, 2022, JEREMY PAULEY notified Mathew Lampi he had a pair of smoker’s lungs for sale.

95. On June 10, 2022, Mathew Lampi asked for a picture of the smoker’s lungs, and JEREMY PAULEY sent him two photographs. They agreed on a price of \$1,900 to be paid through PayPal, and JEREMY PAULEY sent Mathew Lampi a photograph of a USPS barcode on a package with tracking number.

96. On or about May 26, 2022, UAMS transferred one cadaver donated through the Anatomical Gift Program to BUSINESS 1 for

cremation. After cremation, the cremains were to be returned in whole to UAMS.

97. On or about May 28, 2022, Scott informed JEREMY PAULEY through Facebook Messenger that she had obtained a “kidney, lung, heart, trachea, small cut section of calvarium w/ hair,” and agreed to sell them to JEREMY PAULEY for \$800.

98. On or about May 28, 2022, JEREMY PAULEY paid Scott \$800.00 through PayPal.

99. On or about June 30, 2022, UAMS transferred seven cadavers donated through the Anatomical Gift Program to BUSINESS 1 for cremation. After cremation, the cremains were to be returned in whole to UAMS.

100. On or about June 30, 2022, Scott informed JEREMY PAULEY through Facebook Messenger she had “one half head, one whole head minus skullcap, three brains with skullcap, one heart, three liver, five lungs, two kidneys, one full pelvis female, one piece of skin with nipple, four hands.” JEREMY PAULEY agreed to buy them for \$4,000.

101. On or about July 9, 2022, Scott shipped two boxes containing human remains through USPS from Arkansas to JEREMY PAULEY in Thompson, Pennsylvania.

102. In June 2022, JEREMY PAULEY was encountered by local police based on an anonymous tip that he was advertising human remains for sale on Facebook. On or about June 20, 2022, Mathew Lampi sent a message to JEREMY PAULEY through WhatsApp asking, “Hello so what did the police say[?]” JEREMY PAULEY responded that he had been asked about human remains, but that, “in the end the only thing that mattered was nothing was proven grave robbed or stolen out of a morgue,” followed by a smiley face emoji.

103. JEREMY PAULEY transferred 25 payments totaling \$40,049.04 in United States currency to Joshua Taylor via PayPal, including \$3500 on April 1, 2021, \$8250 on October 7, 2021, and \$9000 on January 13, 2022.

104. Mathew Lampi transferred 8 payments totaling \$8,890 in United States currency via PayPal to JEREMY PAULEY. JEREMY PAULEY transferred 71 payments totaling \$119,198.25 in United

States Currency to Mathew Lampi via PayPal, including \$10,000 on October 21, 2021, and shipped Mathew Lampi at least \$15,000 in cash.

105. Fifteen packages shipped through USPS from Enola, Pennsylvania to Mathew Lampi's residence in East Bethel, Minnesota between September 2021, and June 2022. After JEREMY PAULEY changed residences from Enola, Pennsylvania to Bloomsburg, Pennsylvania, another package was sent through USPS from Bloomsburg, PA to Mathew Lampi's residence in East Bethel, Minnesota in August 2022.

All in violation of Title 18, United States Code, Section 371.

THE UNITED STATES ATTORNEY FURTHER CHARGES:

COUNT 2

18 U.S.C. §§ 2314, 2

(Interstate Transport of Stolen Goods, Aid and Abet)

From in or about February 2020 through in or about August 2022,
within the Middle District of Pennsylvania and elsewhere, the
defendant,

JEREMY PAULEY,

did unlawfully transport, transmit, and transfer in interstate
commerce, and did aid, abet, induce, and procure the transportation,
transmission, and transfer of, stolen goods, wares, and merchandise,
that is, human remains, of the value of \$5,000 or more, knowing the
same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Sections 2314 and 2.

GERARD M. KARAM
United States Attorney

Date: June 14, 2023


SEAN A. CAMONI
Assistant United States Attorney