

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your affiant, John P. Allen, being duly sworn, deposes and states the following:

1. I am a Special Agent of the United States Coast Guard Investigative Service (CGIS) and have been so employed for more than seventeen years. I am currently assigned as the Resident Agent in Charge of the CGIS Resident Agent Office, Mobile, Alabama. As such, part of my duties include investigating crimes that occur on, in or over the waters of the United States for which the United States Coast Guard (USCG) has jurisdiction or crimes that affect the USCG in whole or in part. My law enforcement experience prior to becoming a Special Agent with CGIS includes working with the Washington, D.C. Metropolitan Police Department for approximately four and one half years and working for the Norfolk City Sheriff's Office, Norfolk, Virginia. Before beginning my career in law enforcement, I was enlisted with the USCG for four years.

2. This affidavit is submitted in support of probable cause for the arrest of Robert Odom (Odom), DOB: [REDACTED], 1973, who on September 27, 2019, committed one violation of Title 18, United States Code, Section 113 ("Assault within maritime and territorial jurisdiction"). This affidavit is not intended to include all facts or matters observed by me or known by the Government, but is

intended to supply sufficient probable cause to support the charge. I am one of the Special Agents investigating the matter referenced in this affidavit. The information provided is based on my personal knowledge and observations, as well as other information conveyed to me by other law enforcement officers and witnesses.

3. On or about September 27, 2019, at approximately 9:28 pm central time, the commercial fishing vessel [REDACTED] contacted the United States Coast Guard to report an injured crewmember with stabbing injuries. This [REDACTED] vessel was underway fishing in the eastern Gulf of Mexico, approximately 20 to 26 nautical miles South-Southeast of Perdido Pass, south of the Florida/Alabama coast, with the following crewmembers onboard:

J [REDACTED] W [REDACTED]: Captain (Victim)

Robert Odom: Crewman (Subject)

F [REDACTED] T [REDACTED] P [REDACTED]: Crewman (Witness)

4. Prior to the stabbing incident, Odom and P [REDACTED] were onboard the [REDACTED] fishing in their assigned duty positions and W [REDACTED] was in the wheelhouse. There were no previous arguments or altercations reported between the crew prior to the stabbing incident. While fishing, P [REDACTED] came into the wheelhouse and told W [REDACTED] that Odom was making statements claiming that P [REDACTED] and W [REDACTED] were going to kill Odom. W [REDACTED] exited the wheelhouse to talk to Odom. Odom

had a pellet rifle and pointed at W [REDACTED]. W [REDACTED] thought Odom was joking. Odom then climbed onto the roof of the vessel. Shortly thereafter W [REDACTED] and P [REDACTED] heard a lot of noise on the roof as if items were being tossed around. In addition, W [REDACTED] noticed that the engine started sounding different. W [REDACTED] thought that Odom was stuffing something in the exhaust causing the motors to act "funny." W [REDACTED] climbed onto the roof to confront Odom and, as soon as he got on the roof, Odom shot W [REDACTED] in the chest with the pellet rifle. W [REDACTED] then lunged at Odom knocking him down and a struggle ensued. Armed with a long bladed "Bowie" type knife, Odom stabbed W [REDACTED] under the left arm just outside of his armpit, which also caused immediate and profuse bleeding. Odom then stabbed W [REDACTED] on his shoulder just above the shoulder blade which resulted in immediate, profuse bleeding. During the struggle, W [REDACTED] realized he was bleeding, disengaged from the struggle, and exited the roof. Once down from the roof, W [REDACTED] went into the wheelhouse and notified the USCG, via VHF Radio Channel 16. W [REDACTED] and P [REDACTED] remained inside the wheelhouse, while Odom remained outside. While outside, Odom threatened to kill both W [REDACTED] and P [REDACTED]. During W [REDACTED]'s interview, he advised that prior to the attack, he witnessed Odom ingest something W [REDACTED] believed to be drugs.

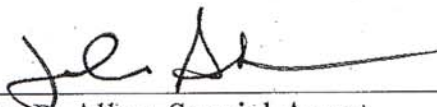


5. The USCG initiated a Search & Rescue mission, additionally Florida Fish and Wildlife Commission officers responded to the location with the USCG. When the USCG personnel arrived on scene, they immediately administered first aid to W [REDACTED] in order to stop the bleeding. W [REDACTED] was then removed from the vessel to land where he was later taken via helicopter to Sacred Heart Hospital in Pensacola, Florida.

6. After the [REDACTED] was moored at the pier in Pensacola, Florida, Odom was evaluated by EMS and released back to USCG Investigative Service who took custody of him. Odom was later taken by CGIS to the Santa Rosa County Sheriff's Office for holding pending court.

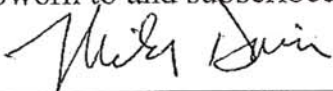
7. Based on the above facts, I respectfully submit that there is probable cause to believe that Richard Odom did knowingly and intentionally assault John W [REDACTED] with a dangerous weapon with intent to do bodily harm, and without just cause or excuse, in violation of Title 18, United States Code, Section 113(a)(3).

8. Your Affiant declares under penalty of perjury that the foregoing is true and correct.



John P. Allen, Special Agent  
Resident Agent in Charge  
United States Coast Guard Investigative Service

Sworn to and subscribed before me this 30<sup>th</sup> day of September, 2019.



MILES DAVIS  
United States Magistrate Judge