

Approved:



MICHAEL D. MAIMIN / T. JOSIAH PERTZ
Assistant United States Attorney

Before:

THE HONORABLE ANDREW E. KRAUSE
United States Magistrate Judge
Southern District of New York

UNITED STATES OF AMERICA

-v.-

DWAYNE PULLIAM,
a/k/a "Doc,"

Defendant.

COMPLAINT

Violation of 18 U.S.C.
§§ 1952(a)(3)(B) and 2 and 21
U.S.C. § 846

COUNTY OF OFFENSE:
PUTNAM

SOUTHERN DISTRICT OF NEW YORK, ss.:

Matthew Tunney, being duly sworn, deposes and says that he is a Task Force Officer with the Federal Bureau of Investigation (the "FBI"), and charges as follows:

COUNT ONE

1. From at least in or about January 2022, up to and including the date of this complaint, in the Southern District of New York and elsewhere, DWAYNE PULLIAM, "Doc," the defendant, did travel in interstate and foreign commerce and use the mail and any facility in interstate and foreign commerce, with intent to otherwise promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, as defined in 18 U.S.C. § 1952(b)(1), to wit, a business enterprise involving narcotics and controlled substances, and thereafter performed and attempted to perform and commit a crime of violence, to wit, murder, to further that unlawful activity, which act resulted in death, to wit, PULLIAM traveled between New York and Connecticut, and used cellular telephones, to promote, manage, establish, and carry on, and facilitate the same, a crack-cocaine-distribution enterprise, and, after such travel, did possess with intent to distribute crack cocaine and further did murder Lori Lynn Campbell to further that drug business.

(Title 18, United States Code, Section 1952(a)(3)(B)).

COUNT TWO

2. From at least on or about January 2022, up to and including the date of this complaint, in the Southern District of New York and elsewhere, DWAYNE PULLIAM, a/k/a “Doc,” the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

3. It was a part and an object of the conspiracy that DWAYNE PULLIAM, a/k/a “Doc,” the defendant, would and did distribute and possess with the intent to distribute one and more controlled substances, in violation of 21 U.S.C. § 841(a)(1).

4. The controlled substances that DWAYNE PULLIAM, a/k/a “Doc,” the defendant, conspired to distribute and possess with intent to distribute were: (1) 28 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as “crack”; and (2) mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(B)&(C).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

5. I am a Task Force Officer with the FBI, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my participation in the investigation, my conversations with other law-enforcement agents, my training and experience, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Each of the witnesses interviewed by law enforcement, as discussed below, including co-conspirators of DWAYNE PULLIAM, a/k/a “Doc,” the defendant, did so voluntarily and without the promise of money or leniency with respect to any criminal investigation.

7. For the reasons set forth below, there is probable cause to believe that, after being released from approximately 24 years’ imprisonment for murder in or about December 2020, DWAYNE PULLIAM, a/k/a “Doc,” the defendant, established an interstate crack-cocaine- and heroin-distribution business, largely storing his drugs in New York State and selling those drugs in Connecticut, working with one and more co-conspirators. Moreover, there is probable cause to believe that PULLIAM believed that Lori Lynn Campbell—who was an acquaintance of PULLIAM’s—was stealing drugs from PULLIAM; as a result, PULLIAM killed Campbell and, with the assistance of one and more co-conspirators, transported Campbell’s body to North Carolina, where PULLIAM and his co-conspirators buried Campbell’s body.

8. I have reviewed the criminal history records for DWAYNE PULLIAM, a/k/a “Doc,” the defendant, and learned that, on or about December 2, 1996, PULLIAM was arrested for murder and criminal possession of a firearm in the fourth degree. According to those records, on or about April 14, 1999, PULLIAM was convicted in New York State Supreme Court, Bronx County, upon a plea of guilty, of intentional murder, in violation of N.Y. PENAL LAW § 125.25(1), a Class A Felony, and was sentenced to 15 years’ to life imprisonment. According to those records, PULLIAM was released to lifetime parole on or about December 1, 2020. Moreover, according to PULLIAM’s criminal history records, PULLIAM has a lengthy criminal history in North Carolina before his arrest for murder in New York. Among others, PULLIAM was convicted in North Carolina for: breaking and entering and larceny and assault on a female on or about September 14, 1981; assault with a deadly weapon with intent to kill on or about September 10, 1985; possession of a firearm by a felon on or about August 22, 1988; trafficking cocaine on or about August 31, 1988; and assault on a female and hit-and-run on or about August 24, 1992.

9. According to records maintained by the New York Department of Corrections and Community Supervision, DWAYNE PULLIAM, a/k/a “Doc,” the defendant, provided the Parole Department with the address of an apartment in an apartment complex in Patterson, New York, as his home, and a phone number ending in 9203 as his cellular telephone number. Moreover, according to records maintained by New York State Department of Motor Vehicles, a burgundy Honda Accord is registered to PULLIAM.¹

Pulliam’s Drug Enterprise

10. There is probable cause to believe that DWAYNE PULLIAM, a/k/a “Doc,” the defendant, engaged in a continuous course of criminal conduct—selling crack cocaine—for the purpose of profit, and that he did so with one and more co-conspirators.

11. On or about April 4, 2022, and April 8, 2022, I and other law enforcement officers conducted surveillance of DWAYNE PULLIAM, a/k/a “Doc,” the defendant. We saw PULLIAM drive in his Honda Accord from New York to several locations in Connecticut in the area of New Milford, Danbury, and Brookfield. PULLIAM was not alone; on April 4, 2022, another person (the “Co-Conspirator”) was in PULLIAM’s Accord with him, and on April 8, 2022, a different co-conspirator was with him. We watched as PULLIAM made several short stops, outside houses and near and in parking lots. During those stops, either PULLIAM would get out of the car and engage in what appeared to be a hand-to-hand transaction with a customer, or a customer would get into PULLIAM’s car and engage in what appeared to be a hand-to-hand transaction with PULLIAM. For example, on or about April 8, 2022, I saw PULLIAM

¹ Law enforcement officers used the license plate assigned to this Honda Accord to identify the car, as discussed in this Complaint.

park the Accord by a gas station. I watched a woman walk out of a house around 50 yards away, walk to the Accord, and get in the back-seat, where she engaged in what appeared to be a hand-to-hand exchange. PULLIAM then drove the woman back to the house, where the woman got out of the car and went into the house.

12. On or about April 11, 2022, law enforcement officers saw the Co-Conspirator and another person in the back seat of a car in New Milford, Connecticut. The Co-Conspirator was holding a knotted wrap containing what turned out to be crack cocaine. Officers approached the car and spoke with both people.

a. Law enforcement officers have spoken with the Co-Conspirator on multiple occasions. The Co-Conspirator admitted to helping DWAYNE PULLIAM, a/k/a “Doc,” the defendant, sell crack cocaine, and dispose of a body of a woman who PULLIAM had murdered.² From speaking with the Co-Conspirator, officers learned:

i. PULLIAM—who is known as “Doc”—would regularly drive from his home in Patterson, New York, to Connecticut to sell crack cocaine to customers. He would frequently drive with the Co-Conspirator, and the Co-Conspirator would watch over the car and any drugs that were in the car while PULLIAM served his customers.

ii. PULLIAM and the Co-Conspirator would communicate, in part, using their cellphones; the Co-Conspirator used TextNow on the Co-Conspirator’s cellphone. PULLIAM used his 9203 number. The Co-Conspirator gave law enforcement the Co-Conspirator’s phone number.

b. Law enforcement officers have also spoken with the other passenger on multiple occasions; the passenger told law enforcement that:

i. The Co-Conspirator “knows something” about the disappearance of Lori Lee Campbell as it relates to “Doc.”

ii. The passenger knows that the Co-Conspirator engages in drug trafficking with a man named “Doc,” who drives in a Honda. The Co-Conspirator rides around with Doc to the locations of drug sales, holds drugs for Doc, and sells drugs for Doc.

13. I have reviewed records from TextNow for the Co-Conspirator’s phone number and learned that it was in frequent contact with the 9203 number belonging to DWAYNE PULLIAM, a/k/a “Doc,” the defendant, through TextNow. For example, from March 25, 2022, through April 10, 2022, the Co-Conspirator’s phone number and PULLIAM’s 9203 number called one another at least 51 times.

² I discuss in greater detail below the Co-Conspirator’s statements about the murder of Lori Lee Campbell and the disposal of her body.

14. On or about April 12, 2022, I and another law enforcement officer spoke with a customer of DWAYNE PULLIAM, a/k/a “Doc,” the defendant, in Danbury, Connecticut (the “Danbury Customer”). The Danbury Customer explained that the Danbury Customer had purchased crack from “Doc” on multiple occasions at the customer’s apartment complex, typically paying approximately \$50.³ Law enforcement officers have reviewed PULLIAM’s credit card statements and learned that the customer had sent PULLIAM money by CashApp in small amount consistent with drug transactions. Moreover, I have watched surveillance footage from the Danbury Customer’s complex, and seen PULLIAM arrive at that complex, in his Honda Accord, on multiple occasions.

15. Law enforcement officers have spoken with at least five people in Connecticut, who informed law enforcement that:

a. For the past several months, “Doc” has supplied them with drugs, including crack cocaine.

b. Doc would typically supply between half a gram and a gram of crack at a time, charging between \$40 and \$100. Each customer has been purchasing crack from Doc since at least in or about January 2022, doing so as frequently as daily and as infrequently as weekly.⁴

16. On or about April 8, 2022, the Connecticut State Police conducted a traffic stop of DWAYNE PULLIAM, a/k/a “Doc,” the defendant, while he was driving his Honda Accord. They found crack cocaine on PULLIAM and arrested him. They also found a cellular telephone, for which a judge issued a search warrant. I have reviewed electronically stored information from that phone and learned the following:

a. The phone contains an image, dated on or about March 24, 2022, of a digital scale with several pieces of a hard, white substance, which appears, based on training and experience, to be crack cocaine. The scale shows approximately over 5 grams.

b. On or about March 29, 2022, at approximately 4:06 pm, the phone received a text: “Hey doc are you around I only need to get 20 hard.” The following day, at approximately 1:06 pm, the phone received another text from the same number: “Hi any chance you’re around and have soft,” and then, three minutes later: “Actually if you only have hard that’s fine too.” Based on my training and experience, I

³ In my training and experience, the retail price of crack cocaine is around \$100 a gram; so \$50 would correspond to about half a gram of crack cocaine.

⁴ Even if PULLIAM had no customers other than each of these five customers, and sold each one the minimum amount (half a gram) at the lowest level of frequency (once a week), over the 15 weeks from January through last week, that would equal 37.5 grams of crack.

know that “hard” and “soft” are common slang for, respectively, crack cocaine and powder cocaine.

c. On or about April 4, 2022, the phone received a text: “I have a sale for a 50 and 2 bags are u gonna be a long time.”⁵ Based my training and experience, I believe that PULLIAM’s customer was offering to buy two small bags of crack for \$50.

17. On or about April 3, 2022, law enforcement officers spoke with another person who admitted to selling crack cocaine with DWAYNE PULLIAM, a/k/a “Doc,” the defendant. That person explained that, several weeks before the murder of Lori Lynn Campbell, PULLIAM and that person drove to Campbell’s home in Carmel, New York, where PULLIAM sold crack cocaine to Campbell.

18. I have reviewed cell site data for the 9203 number belonging to DWAYNE PULLIAM, a/k/a “Doc,” the defendant, as well as license-plate-reader data, and learned that the phone using PULLIAM’s 9203 number and PULLIAM’s Honda Accord frequently travel from in and about Patterson, New York, to various locations in Connecticut, including to areas around where those crack-cocaine customers of PULLIAM’s who law enforcement has interviewed lived. For example, on or about March 29, 2022, PULLIAM traveled from Patterson, New York, to Danbury Connecticut. I have reviewed surveillance footage from the Danbury Customer’s apartment complex for that day, and saw that PULLIAM visited the apartment complex and walked to the Danbury Customer’s apartment. The Danbury Customer told law enforcement that the Danbury Customer bought crack cocaine from PULLIAM that day.

Pulliam Murders Lori Lynn Campbell, Drives Her Body to North Carolina, and Buries Her Body

19. On or about April 2, 2022, two different people approached the Putnam County Sheriff’s Office at separate times to report that they had not heard from Lori Lynn Campbell since March 27, 2022; each said that the last contact they had with Campbell was by text message on March 27, 2022. They each explained that Campbell used a phone number ending in 5688.

20. A law enforcement officer spoke with one of Campbell’s neighbors, who told the officer that the neighbor last saw Campbell getting into her car—an Acura RSX⁶—on or about March 28, 2022.

⁵ The phone showed the text as coming from a customer with the same first name as the Danbury Customer.

⁶ According to the New York State Department of Motor Vehicles, a 2003 Acura RSX is registered to Campbell. Law enforcement officers used the license plate assigned to that car to identify the car, as discussed in this Complaint.

21. I have reviewed toll records for Campbell's 5688 number and learned:

a. On or about March 28, 2022, Campbell's 5688 number contacted the 9203 number belonging to DWAYNE PULLIAM, a/k/a "Doc," the defendant, on March 28, 2022, at approximately 9:37 am.

b. Campbell's 5688 number and PULLIAM's 9203 number were in contact with one another eight times on or about March 28, 2022.

c. There have been no outgoing phone calls from Campbell's 5688 number since March 28, 2022.

22. I have reviewed cell site records for Campbell's 5688 number and the 9203 number belonging to DWAYNE PULLIAM, a/k/a "Doc," the defendant, and learned:

a. On or about March 28, 2022, from approximately 12:26 am through approximately 5:40 am, the phones using Campbell's 5688 number and the 9203 number belonging to DWAYNE PULLIAM, a/k/a "Doc," were in the area around Campbell's home in Carmel, New York.

b. On or about March 28, 2022, from about 10:13 am, to March 29, 2022, at about 11:00 am, the phone using Campbell's 5688 number was in the area of the apartment complex in Patterson, New York, where PULLIAM lives.

c. There has been no cell-site activity for Campbell's 5688 number since March 31, 2022.⁷

23. According to the Putnam Department of Social Services, Campbell maintained an active EBT account. The most recent transaction was on March 27, 2022; there has been no EBT activity since then.

24. Investigators spoke with the Co-Conspirator, who told them the following:

a. On March 29, 2022, DWAYNE PULLIAM, a/k/a "Doc," the defendant, contacted the Co-Conspirator and asked for help moving a car. The Co-Conspirator went to PULLIAM's home in Patterson, New York, where PULLIAM had the Co-Conspirator drive an Acura to a Connecticut Welcome Center while PULLIAM followed the Co-Conspirator in PULLIAM's Honda Accord. After the Co-Conspirator dropped the Acura off at the Connecticut Welcome Center, PULLIAM and the Co-

⁷ In my training and experience, if a phone goes dead—its battery runs out—there will be no cell site activity.

Conspirator drove around the New Milford, Connecticut, area⁸ in PULLIAM's Accord and Pulliam told the Co-Conspirator: "you're tied in."

b. Later that day, PULLIAM told the Co-Conspirator that they "had to leave." PULLIAM and the Co-Conspirator drove south, toward North Carolina, in PULLIAM's Accord. While driving, PULLIAM said that PULLIAM had suspected that Campbell was stealing drugs from him.⁹ PULLIAM said that he noticed that a bag of crack cocaine—a sale quantity of approximately a gram—was missing, so he put out another bag of crack cocaine to see what would happen. PULLIAM said that PULLIAM and Campbell were at PULLIAM's house, using drugs, when PULLIAM saw that the second bag of crack was also missing. PULLIAM said that PULLIAM confronted Campbell about the thefts. PULLIAM said that Campbell tried to leave, but PULLIAM would not let her do so. PULLIAM said that Campbell started screaming, and PULLIAM "stopped her from screaming." PULLIAM told the Co-Conspirator that this was not the first time he has "done this."

c. PULLIAM and the Co-Conspirator drove to PULLIAM's mother's house in Mebane, North Carolina, where the Co-Conspirator saw PULLIAM speak with PULLIAM's brother—who was in a wheelchair and drove a gray Honda Odyssey—about buying drugs and where to leave a body.

d. The Co-Conspirator saw PULLIAM get two shovels from his mother's house and load them into his brother's Honda Odyssey. The Co-Conspirator—driving with PULLIAM in PULLIAM's Accord—followed the Odyssey to a long road with a dead-end cul-de-sac. PULLIAM backed his Accord to the end of the cul-de-sac and opened the trunk. PULLIAM took the tools out of the van, and then took out what appeared to be a body wrapped in multiple comforters from the trunk of his Accord and took them all down a hill and out of sight. Later, PULLIAM returned.

e. The next day, PULLIAM and the Co-Conspirator drove in PULLIAM's Honda to the cul-de-sac. PULLIAM took a shovel from the trunk of the Accord and went down a hill and out of sight again.

f. On or about April 2, 2022, the Co-Conspirator and PULLIAM drove back to Connecticut; PULLIAM drove his Accord, and the Co-Conspirator drove a Chevrolet Blazer that PULLIAM got in North Carolina.

⁸ New Milford, Connecticut, Danbury, Connecticut, Brewster, New York, and Patter-
son, New York, are all within several miles of one another.

⁹ I spoke with a crack-cocaine customer of DWAYNE PULLIAM, a/k/a "Doc," the de-
fendant, who told me that, some time before the murder, the customer was at Lori
Lee Campbell's home with, among others, PULLIAM. On that occasion, PULLIAM
accused Campbell of stealing a bag of crack from him.

25. In a subsequent conversation with investigators, the Co-Conspirator admitted greater culpability:

a. After dropping the Acura off at a Connecticut Welcome Center, while driving around the New Milford area, DWAYNE PULLIAM, a/k/a “Doc,” told the Co-Conspirator about Campbell’s theft and how he had silenced her (instead of explaining it while on the drive to North Carolina). The Co-Conspirator and PULLIAM returned to PULLIAM’s apartment in Patterson, New York, where the Co-Conspirator saw Campbell, dead, wrapped in a sheet. PULLIAM said: “there’s the culprit.” Very early in the morning of March 30, 2022, PULLIAM told the Co-Conspirator to help him move the body, threatening to kill the Co-Conspirator’s family if the Co-Conspirator did not do so. The Co-Conspirator helped PULLIAM move Campbell’s body to PULLIAM’s Honda Accord, and they then drove to North Carolina.

b. The Co-Conspirator also explained that, at PULLIAM’s mother’s house, at PULLIAM’s direction, the Co-Conspirator got two shovels, a bag of lime, and plastic wrap from the shed by PULLIAM’s mother’s house.

26. According to the Connecticut State Police, on or about April 2, 2022, law enforcement officers recovered Campbell’s Acura from the parking lot of a Connecticut Welcome Center in Danbury, Connecticut.

27. I have reviewed cell site data for both Campbell’s 5688 number and the 9203 number belonging to DWAYNE PULLIAM, a/k/a “Doc,” the defendant, and learned the following:

a. On March 29, 2022, the phones using both Campbell’s 5688 number and PULLIAM’s 9203 number were in the area of PULLIAM’s apartment complex in Patterson, New York between approximately 5:36 am and 5:47 am, and between approximately 9:38 am and 9:54 am.

b. On March 29, 2022, the phone using Campbell’s 5688 number was in the area of I-84 and Starr Ridge Road in Brewster, New York, around 11:10 am.

c. On March 29, 2022, at approximately 12:05 pm, the phones using both Campbell’s 5688 number and PULLIAM’s 9203 number were in the area of PULLIAM’s apartment complex in Patterson, New York.

d. On March 29, 2022, at approximately 12:15 pm, the phones using both Campbell’s 5688 number and PULLIAM’s 9203 number were moving consistent with traveling eastbound on I-84, west of Starr Ridge Road, in Brewster, New York, toward Connecticut.

e. On March 29, 2022, from approximately 12:45 pm through at least approximately 3:45 pm, the phones using both Campbell’s 5688 number and PULLIAM’s 9203 number were in various areas in or near Danbury, Connecticut, and New Milford, Connecticut.

28. I have reviewed surveillance videos and photographs, and data from license-plate readers, looking for Campbell's Acura RSX and the Honda Accord belonging to DWAYNE PULLIAM, a/k/a "Doc," the defendant, and learned the following:

a. On March 29, 2022, at approximately 11:10 am, Campbell's Acura was traveling east on I-84 in the area of Starr Ridge Road in Brewster, New York. PULLIAM's Honda Accord followed directly behind Campbell's Acura.

b. On March 29, 2022, at approximately 12:16 pm, PULLIAM's Accord was traveling eastbound on I-84, passing Starr Ridge Road in Brewster, New York.

c. On March 29, 2022, at approximately 12:44 pm, PULLIAM's Accord entered an apartment complex in Danbury, Connecticut, at a time that cell site data showed that the phones using both Campbell's 5688 number and PULLIAM's 9203 number were in the area. Surveillance cameras captured PULLIAM walking into the complex.

29. I have reviewed cell site data, highway surveillance video, and data provided by bridges and license-plate readers and learned the following:

a. On March 30, 2022, at approximately 5:06 am, both the Honda Accord belonging to DWAYNE PULLIAM, a/k/a "Doc," the defendant and the hone using PULLIAM's 9203 number were in the area of Mamaroneck Road in Scarsdale, New York.

b. On March 30, 2022, at approximately 5:25 am, PULLIAM's Honda Accord crossed the Alexander Hamilton Bridge, from the Bronx into Manhattan, and, approximately a minute later, crossed the George Washington Bridge, from Manhattan into New Jersey.

c. On March 30, 2022, at several times, PULLIAM's Honda Accord was captured driving south toward North Carolina, and, at approximately 4:58 pm, was captured in I-85 in or around Granville, North Carolina.¹⁰

d. On April 2, 2022, at approximately 3:33 pm, both PULLIAM's Honda Accord and a vehicle with the same license plate as the Chevrolet Blazer in which PULLIAM was later seen, as discussed below, were captured heading north on I-95 in North Carolina.¹¹ Six-and-a-half hours later, at approximately 10:01 pm, PUL-

¹⁰ Granville, North Carolina is on I-85's route to Mebane, North Carolina.

¹¹ The license-plate reader data I received did not include photographs of the car, so I can only discuss the license plate.

LIAM's Honda Accord was captured heading north on I-295 in Delaware; at approximately 10:35 pm, a vehicle with the same license plate as the Chevrolet Blazer in which PULLIAM was later seen was captured heading north on I-295 in Delaware.¹²

30. I have reviewed records from TextNow for the Co-Conspirator's phone number and learned that, despite the frequent contact with the 9203 number belonging to DWAYNE PULLIAM, a/k/a "Doc," the defendant, through TextNow, as discussed above, after PULLIAM's 9203 number called the Co-Conspirator's phone number at approximately 12:01 pm on March 28, 2022, there were no phone calls between PULLIAM's 9203 number and the Co-Conspirator's phone number until April 2, 2022, at approximately 1:05 pm.

31. On or about April 4, 2022, I and another law enforcement officer saw DWAYNE PULLIAM, a/k/a "Doc," the defendant, in Danbury, Connecticut. PULLIAM was driving a black 1999 Chevrolet Blazer with the license plate captured heading north on April 2, 2022, as discussed above. We spoke with PULLIAM, who told us, among other things:

a. PULLIAM had spoken with Campbell "about a week ago," that Campbell had said that she was getting ready to go to rehab, that he had not spoken with Campbell since, and that he was involved in a periodic sexual relationship with Campbell. He also said that the last time he saw Campbell was about two weeks earlier, at Campbell's house, where they had sex.

b. When I asked PULLIAM—who is a manager at a rehabilitation facility—whether he thought Campbell might be there, PULLIAM said that he "knows" that Campbell was not at the facility because he receives a list of the new patients via e-mail, and he checked this list on his work cell phone.

c. PULLIAM had been on vacation for a week, had another seven days of vacation to use, and was considering going to Sweden.

32. Investigators spoke with supervisors at the rehabilitation facility where PULLIAM works and were told:

a. PULLIAM had not reported to work starting March 26, 2022, even though he was scheduled to work during that time, and had not contacted the facility about his absence.

¹² According to TextNow records, during the drive north, the Co-Conspirator's phone number and PULLIAM's 9203 number texted one another several times regarding driving directions, with texts such as "I'm at Dublin donuts" and "I am at same exit where I lost you."

b. The facility did not issue a work phone to PULLIAM and does not send PULLIAM e-mails regarding new patients.

33. On or about April 20, 2022, other law enforcement officers and I went to the cul-de-sac in North Carolina where the Co-Conspirator said that DWAYNE PULLIAM, a/k/a “Doc,” the defendant, took Campbell’s body out of PULLIAM’s Honda Accord. The day before, law enforcement officers had recovered the body from the area indicated by the Co-Conspirator; they told me that it was wrapped in plastic. I looked at the area where the body was recovered, and saw that it was dug up from a shallow grave. I have seen photographs of Campbell from when she was alive, and, upon viewing the exhumed body, I saw that it was covered in a mineral, like lime or lye, and appeared to be Campbell’s.¹³

34. Also on or about April 20, 2022, law enforcement officers executed a search warrant on the house and shed belonging to the mother of DWAYNE PULLIAM, a/k/a “Doc,” the defendant, and found, among other things, two shovels consistent with the Co-Conspirator’s description.

35. On or about April 20, 2022, law enforcement officers arrested DWAYNE PULLIAM, a/k/a “Doc,” the defendant, in the area of New Milford, Connecticut.

¹³ In my training and experience, I know that medical examiners can often perform various tests to confirm the identity of a body. However, it typically takes time to do so.

WHEREFORE, deponent respectfully requests that DWAYNE PULLIAM, a/k/a "Doc," the defendant, be imprisoned, or bailed, as the case may be.

/s/ Matthew Tunney
(by AEK, with permission)

Matthew Tunney
Task Force Officer
Federal Bureau of Investigation

Sworn to me by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1 this 21st day of April, 2022 [by FaceTime]

Andrew Kraus

UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK