
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : HON. MADELINE COX ARLEO
 :
 v. : Magistrate No. 10-
 :
 WILLIAM SCOTT : **CRIMINAL COMPLAINT**

I, Alethea Harris, being duly sworn, state the following is true and correct to the best of my knowledge and belief. Between in or about October 2009 and March 13, 2010, in Morris County, in the District of New Jersey and elsewhere, defendant WILLIAM SCOTT did:

SEE ATTACHMENT A

In violation of Title 18, United States Code, Sections 668 and 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Alethea Harris
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on March 13, 2010 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Between in or about October 2009 and March 13, 2010, in Morris County, in the District of New Jersey and elsewhere, defendant WILLIAM SCOTT did

knowingly and willfully steal and obtain by fraud from the care, custody, and control of a museum an object of cultural heritage, namely a letter from John Wesley to Father Merriweather from December 1766.

In violation of Title 18, United States Code, Section 668 and Section 2.¹

¹ 18 U.S.C. § 668 provides:

(a) Definitions:

In this section -

(1) "museum" means an organized and permanent institution, the activities of which affect interstate or foreign commerce, that -

(A) is situated in the United States;

(B) is established for an essentially educational or aesthetic purpose;

(C) has a professional staff; and

(D) owns, utilizes, and cares for tangible objects that are exhibited to the public on a regular schedule.

(2) "object of cultural heritage" means an object that is -

(A) over 100 years old and worth in excess of \$5,000...

(b) Offenses. - A person who -

(1) steals or obtains by fraud from the care, custody, or control of a museum any object of cultural heritage ... shall be fined ... imprisoned ... or both.

ATTACHMENT B

I, Alethea Harris, am a Special Agent with the Federal Bureau of Investigation. I have knowledge about the facts set forth below from my involvement in the investigation, review of reports and documents, and discussions with other law enforcement officials and members of the staff at the United Methodist Archives Center. This complaint is submitted for a limited purpose, and I have not set forth each and every fact that I know concerning this investigation. All statements described herein are relayed in substance and in part.

BACKGROUND

1. Drew University is a private university located in Madison, New Jersey that has both undergraduate and graduate programs. Located at Drew University is the United Methodist Archives Center (the "Archives Center") which houses many published and unpublished materials on global Methodism. The Archives Center is home to the Methodist Library, the Wilson Reading Room, and the archives of the General Commission on Archives and History of The United Methodist Church ("GCAH"). The GCAH is the official archival repository for The United Methodist Church. Its collection includes records from the various denominational agencies within the United Methodist tradition, and personal papers of several bishops, denominational leaders, and missionaries from the 18th, 19th, and 20th centuries. The Archives Center, which was established for an essentially educational purpose and has a professional staff, exhibits some of the records in its collection to the public on a regular schedule. Many of the important documents housed at the Archives Center are maintained in a secure storage room that is locked and only accessible to those given keys by the Archives Center.
2. Included among the papers stored in the secure storage room at the Archives Center are approximately 145 letters of John and Charles Wesley (the "Wesley Letters"), the founders of Methodism. These letters were written in the 18th and 19th centuries and have significant importance to the Methodist religion. The value of these letters on the open market ranges from approximately \$5,000 to \$12,000 per letter. Because of their significance and value, the Archives Center considers the Wesley Letters to be a closed collection meaning that no one is allowed to touch or look at the original letters. To make sure the public has access to these documents, however, the Archives Center has scanned them and made them available on the Internet. Individuals who work at the Archives Center are generally aware that these letters are among the Archives' most significant and valuable documents. Also included among the documents at the Archives Center are various letters written by past Presidents of the United States including Abraham Lincoln, Franklin Delano Roosevelt, and Dwight D. Eisenhower to various Methodist Bishops and other important Methodist figures.
3. Defendant WILLIAM SCOTT, formerly a resident of Longmeadow, Massachusetts, matriculated as an undergraduate student at Drew University in the Fall 2009. Starting in or about August 2009 through the present, defendant WILLIAM SCOTT lived in on-campus housing at Drew University ("Scott's Dorm Room").

4. In addition to being a student, since in or about October 2009 through the present, defendant WILLIAM SCOTT was also a paid student assistant at the Archives Center who typically worked 4 days a week, 2 to 3 hours a day. In this position, defendant WILLIAM SCOTT was given a key and access to the secure storage room in which the Wesley Letters and other historical documents were kept. In his role as a student assistant, part of defendant WILLIAM SCOTT'S responsibility was to access documents contained in the secure storage area when they were requested by a person conducting research.
5. Company 1 is a company located in the United Kingdom that describes itself as being a dealer in autograph letters, historical documents and textual manuscripts, together with signed photographs and other related material having a close association with historical figures in all fields.

**THE THEFT OF CERTAIN WESLEY LETTERS
AND OTHER HISTORICAL DOCUMENTS**

6. Sometime before March 1, 2010, an employee of Company 1 ("J.W.") was contacted by email by a private individual in the United States claiming to be in possession of and able to sell a number of the Wesley Letters. J.W. requested that the individual ship him a sampling of the letters so that they could be authenticated before he purchased them.
7. On or about March 3, 2010, J.W. received a Federal Express package in the United Kingdom that had a return address of William Scott in Longmeadow, Massachusetts. Inside the package were approximately ten of the Wesley Letters. In part because these important and valuable documents were shipped in an unprofessional manner – two of the letters were damaged in transit – J.W. contacted the Archives Center, the well known repository of significant Wesley Letters. After being contacted by J.W., members of the Archives Center conducted a review of the Wesley Letters and determined that between approximately 21 and 23 of the Wesley Letters were missing from the Archives Center. No authorization had been given for their removal from the Archives Center.
8. On or about March 12, 2010, Federal Express confirmed to law enforcement that a Federal Express package had been sent by William Scott on March 1, 2010 from East Hanover, New Jersey and was received by Company 1 on March 3, 2010. East Hanover is approximately six miles from Drew University, the Archives Center, and Scott's Dorm Room.
9. On or about March 13, 2010, law enforcement searched Scott's Dorm Room pursuant to a search warrant. Inside a drawer in a dresser contained in defendant WILLIAM SCOTT's closet was a folder that contained approximately six of the Wesley Letters and approximately eleven other important and valuable historical documents, none of which Defendant WILLIAM SCOTT or anyone else was authorized to remove from the Archives Center. Of note, law enforcement recovered the following:

- Letter from John Wesley to Father Merriweather from December 1766
- Letter from President Abraham Lincoln from May 1864
- Deed signed by President Andrew Johnson from September 1865
- Letter from President William McKinley to Bishop Fowler from November 1894
- Letter from President Franklin Delano Roosevelt from June 1935
- Letter from President Franklin Delano Roosevelt from June 1945
- Letter from President Dwight D. Eisenhower from February 1953
- Letter from Vice-President Richard Nixon to Bishop Welch from May 1953
- Letter from Robert F. Kennedy to Bishop Welch from January 1967
- Letter from Madame Chiang Kai-Shek to Bishop Welch from April 1953

10. The John Wesley to Father Merriweather letter described above is more than 100 years old and is worth more than \$5,000.

11. Inside defendant WILLIAM SCOTT'S desk in his Dorm Room, law enforcement also recovered two Federal Express receipts. One of the receipts was from "William John Scott" to Company 1. The second was from "William Scott" to an individual, "N.C.," in Hagerstown, Maryland. N.C. is a dealer of historic religious artifacts who is based in Hagerstown, Maryland.