

Office of the Inspector General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530-0001

April 10, 2025

RE: **\*\*AMENDED COMPLAINT\*\*** AGAINST THE FEDERAL BUREAU OF INVESTIGATIONS FOR  
FAILURE TO INVESTIGATE PUBLIC CORRUPTION AND CIVIL RIGHTS VIOLATIONS AND FOR  
ENGAGING IN RETALIATORY CONDUCT

Dear Inspector General,

I am submitting this amended formal complaint to the Office of the Inspector General (OIG) regarding the Federal Bureau of Investigation's (FBI) ongoing pattern of misconduct, including: (1) failure to investigate documented allegations of public corruption, perjury, malicious prosecution, and civil rights violations committed by officials in Lafayette County, Mississippi; and (2) active obstruction and retaliation against my attempts to report federal crimes at multiple FBI field offices. The amendment includes a new incident that occurred on March 31, 2025, at the Salt Lake City FBI Field Office, which further demonstrates the Bureau's systematic pattern of obstruction, retaliation, and disregard for constitutional rights.

**BACKGROUND FROM ORIGINAL COMPLAINT (FEBRUARY 25, 2025)**

On October 28, 2022, I attempted to report public corruption and police misconduct involving the Holly Springs Police Department and Lafayette County Sheriff's Department to the FBI office in Oxford, Mississippi. Prior to my visit, I confirmed with the FBI that I could walk in to provide evidence of misconduct. However, upon my arrival, I found no agents available, and my attempt to report these crimes was later used against me in a wrongful probation revocation. The misconduct included perjury by Lafayette County Sheriff's Deputy Kandace Beavers, who falsely testified that I had entered the FBI office without permission and without a lawful purpose, despite clear audio recordings proving otherwise. This perjury was knowingly used by Assistant District Attorney Tiffany Kilpatrick, who petitioned for my probation to be revoked based on these false statements. Kilpatrick's politically motivated prosecution occurred while she was running for Lafayette County Judge, using my case as a campaign advantage.

The FBI had a duty to investigate violations of federal law, including but not limited to:

- 18 U.S.C. § 241 (Conspiracy against Rights)
- 18 U.S.C. § 242 (Deprivation of Rights Under Color of Law)
- 18 U.S.C. § 1503 (Obstruction of Justice)

Despite these clear violations, the FBI refused to act, effectively shielding corrupt local officials from accountability.

### **NEW INCIDENT (3/31/2025) DEMONSTRATING CONTINUING PATTERN OF MISCONDUCT**

On March 31, 2025, I visited the FBI Salt Lake City Field Office to deliver an affidavit alleging serious misconduct and potential federal crimes by Captain Hildon Sessums of the Oxford, Mississippi Police Department. Captain Sessums has previously admitted to being a graduate of the FBI National Academy, which I believe may explain the federal government's ongoing unwillingness to investigate his conduct or accept reports implicating him in civil rights violations and unlawful surveillance.

Upon my arrival at the Salt Lake City FBI office, I experienced treatment nearly identical to my previous attempts to report crimes to the FBI:

1. I was denied entry past the outer visitor gate, despite arriving during normal business hours for the lawful purpose of submitting evidence of federal crimes.
2. FBI agents refused to approach to retrieve my affidavit or engage in substantive discussion about the documented criminal allegations.
3. Instead, they demanded my driver's license and personal identification for the purpose of conducting a full background check before they would even accept documentary evidence from me.
4. When I explicitly refused to submit to this background check, citing my Fourth Amendment rights, the FBI agent became hostile and refused to accept my affidavit or criminal complaint.
5. I began reporting on this obstruction live while standing in the publicly accessible visitor parking lot. Two FBI agents approached me without warning and ordered me to leave immediately under threat of arrest for trespassing.

6. When I asserted my right to be present in a public visitor area as a journalist and civilian, they falsely claimed the parking lot was "FBI-owned private property" and threatened criminal charges if I did not leave.

7. An agent further recorded my license plate number, escalating the surveillance and harassment against me.

This incident establishes:

- A violation of my First Amendment right to petition the government and report as a journalist
- A violation of my Fourth Amendment right against suspicion-less search
- A retaliatory pattern against a known journalist and rights advocate
- Probable unlawful sharing of intelligence with Captain Sessums due to his institutional ties to the FBI

### **SPECIFIC FAILURES OF THE FBI**

#### **1. Failure to Investigate Perjury and Fabricated Evidence**

The FBI was presented with clear audio recordings contradicting Deputy Beavers' false testimony, yet it failed to act or intervene.

#### **2. Neglecting to Investigate Retaliatory Prosecution**

The FBI ignored evidence that my prosecution was retaliatory, designed to punish me for exercising my First Amendment rights as a journalist.

#### **3. Allowing Obstruction of Justice**

The FBI refused to investigate Assistant District Attorney Tiffany Kilpatrick's abuse of the judicial process, despite her using false evidence to secure my wrongful conviction while campaigning for a judgeship. This was also the case when it came to Lafayette County Sheriff's Deputy Kandace Beavers' intentional lies in court. This evidence of obstruction regarding the FBI has carried over to the newly referenced events demonstrating a systemic failure that has created a pattern and practice.

#### **4. Pattern of Negligence in Handling Civil Rights Violations**

The FBI's refusal to investigate demonstrates a pattern of systemic failure to address public corruption and law enforcement misconduct in Lafayette County. This is again demonstrated by the events occurring on March 31, 2025 in Salt Lake City, Utah

## **5. Evidence of Unlawful Surveillance That the FBI Refuses to Investigate**

On February 1, 2025, I moved into a new residence in Layton, Utah. I had not yet disclosed this address to any government agency, had not updated it with DMV or USPS, and had not published it on any platform. The address was known only to my landlord and myself.

Despite this, on February 5, 2025—just four days after my move—Captain Hildon Sessums of the Oxford Police Department emailed my exact new residential address to multiple officials within the Layton City Police Department. Sessums falsely claimed this information was obtained "from our research," despite the fact that no lawful research method could have discovered this address.

This communication provides compelling evidence of potential federal crimes including:

- Unlawful surveillance in violation of the Fourth Amendment
- Misuse of government databases or resources
- Interstate stalking (18 U.S.C. § 2261A)
- Computer fraud to obtain protected information (18 U.S.C. § 1030)

This surveillance incident was the primary subject of the affidavit I attempted to submit to the FBI Salt Lake City Field Office on March 31, 2025, which they refused to accept without requiring me to surrender my Fourth Amendment rights.

## **6. Unconstitutional Barriers to Reporting Federal Crimes**

The FBI has established a pattern of imposing unconstitutional conditions on crime victims and whistleblowers seeking to report federal offenses, including requiring background checks before accepting documentary evidence of criminal conduct.

## **7. Retaliatory Conduct Against Journalists and Whistleblowers**

The FBI has engaged in a pattern of harassment, surveillance, and intimidation directed at individuals attempting to report misconduct by law enforcement officers with ties to FBI training programs.

## **8. Misuse of Trespass Threats to Chill First Amendment Activity**

FBI personnel have demonstrated a pattern of mischaracterizing public areas as "private property" to threaten journalists with arrest for constitutionally protected activity.

## **9. Inter-jurisdictional Pattern of Obstruction**

The identical treatment across multiple FBI field offices (Oxford, Mississippi and Salt Lake City, Utah) separated by substantial geography and time demonstrates a nationwide policy or

practice of obstructing certain types of reports, particularly those implicating law enforcement officers with FBI connections.

### **REQUESTED ACTION BY THE OIG**

I respectfully request that the Office of the Inspector General:

1. Conduct an independent investigation into the FBI's failure to act on credible evidence of public corruption and civil rights violations, as well as its active obstruction of attempts to report such violations.
2. Investigate whether the FBI has established formal or informal policies designed to shield graduates of the FBI National Academy and other connected law enforcement personnel from scrutiny or accountability.
3. Examine FBI visitor policies at field offices nationwide to determine whether constitutional barriers are being systematically imposed on individuals attempting to report crimes.
4. Initiate disciplinary action against FBI personnel who neglected their duty to investigate these allegations or who engaged in retaliatory conduct.
5. Refer the matter to the Civil Rights Division of the U.S. Department of Justice for further action regarding both the original Mississippi misconduct and the new constitutional violations in Utah.
6. Ensure that safeguards are put in place to prevent future instances of FBI inaction, obstruction, and retaliation in similar cases.
7. Issue formal guidance to all FBI field offices clarifying that requiring background checks as a precondition to accepting criminal complaints or documentary evidence violates constitutional rights and DOJ policy.
8. Investigate how Captain Hildon Sessums obtained my undisclosed residential address on February 5, 2025, including whether FBI resources, databases, personnel, or surveillance capabilities were improperly utilized or accessed.

## **CONCLUSION**

The FBI's refusal to investigate serious violations of federal law, coupled with its active obstruction and retaliation against attempts to report such violations, has resulted in ongoing miscarriages of justice, wrongful imprisonment, violations of constitutional rights, and the perpetuation of corruption. The pattern of misconduct now spans multiple FBI field offices across the country and multiple years, demonstrating a systemic problem requiring urgent OIG intervention.

For the ease and expediting of handling this amended complaint, I am attaching supporting evidence including call recordings, audio recordings, transcripts, court documents, and my sworn declaration regarding the March 31, 2025 incident. I will readily provide any additional information this office may possibly need. Please confirm receipt of this amended complaint and advise on the next steps regarding the investigation.

Sincerely,

A handwritten signature in black ink, appearing to read 'MOR', with a horizontal line drawn underneath it.

Matthew Oliver Reardon

PO Box 16044

Clearfield, UT 84016

(662)701-2458

mreardon@wtpnews.org

## Exhibit List

**Exhibit A-** Call to Oxford, MS FBI Field Office (662-234-1713) 10/28/2022 at 10:37AM.

**Online Access:** [rebrand.ly/fbicall102822](https://rebrand.ly/fbicall102822)

**Exhibit B-** Call to Lafayette County Sheriff's Office (662-234-6421) 10/28/2022 at 10:41AM.

**Online Access:** [rebrand.ly/beavers1041](https://rebrand.ly/beavers1041)

**Exhibit C-** Call from Deputy Beavers (662-234-6421) made on 10/28/2022 at 10:48AM.

**Online Access:** [rebrand.ly/beavers1048](https://rebrand.ly/beavers1048)

**Exhibit D-** Call from Deputy Beavers (662-234-6421) made on 10/28/2022 at 11:00AM.

**Online Access:** [rebrand.ly/beavers1100](https://rebrand.ly/beavers1100)

**Exhibit E-** Call to Deputy Beavers (662-234-6421) made on 10/28/2022 at 2:46PM.

**Online Access:** [rebrand.ly/beavers1446](https://rebrand.ly/beavers1446)

**Exhibit F-** Petition to Revoke Plaintiff's Probation. Filed by Asst DA Tiffany Kilpatrick 11-1-22

**Online Access:** [rebrand.ly/petition110122](https://rebrand.ly/petition110122)

**Exhibit G-** Transcript of Revocation Hearing 11/3/2022 where Kandace Beavers lies saying I lied and that I didn't have a lawful reason to commute to the FBI Office even though I conveyed everything properly to her.

**Online Access:** [rebrand.ly/transcript110322](https://rebrand.ly/transcript110322)

**Exhibit H-** Declaration of Matthew Oliver Reardon regarding Hildon Sessums Surveillance

**Online Access:** [rebrand.ly/declaration-on-sessums](https://rebrand.ly/declaration-on-sessums)

**Exhibit I -** Declaration of Matthew Oliver Reardon regarding March 31, 2025 incident at Salt Lake City FBI Field Office

**Online Access:** [rebrand.ly/reardon-declaration-fbi](https://rebrand.ly/reardon-declaration-fbi)