

**IN THE CRIMINAL COURT FOR SULLIVAN COUNTY
AT BLOUNTVILLE, TN**

STATE OF TENNESSEE

VS.

LAKEEM KEON SCOTT

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CASE NO. S66,811

STATEMENT OF FACTS

Comes Now the State of Tennessee and the Defendant, Lakeem Keon Scott, who agree for the purpose of this Honorable Court's acceptance of the Defendant's plea of Guilty to the offenses charged in this cause, that the facts stated herein are true and correct and establish a factual basis for the Defendant's plea:

At approximately 2:00 AM on Thursday, July 7th, 2016, the Defendant armed himself with multiple firearms and ammunition and walked a short distance from his apartment to the Volunteer Parkway, a major thoroughfare in Bristol, Tennessee. Upon his arrival at the Volunteer Parkway, the Defendant positioned himself on the shoulder of the roadway and began firing his rifle, a semi-automatic AR-15, at motorists traveling on the parkway. The Defendant fired numerous rounds and hit at least three vehicles traveling on the parkway.

A SUV traveling south on the parkway was hit multiple times. The driver, Jennifer Ophelia Rooney, was shot in the head by the defendant. After being shot, Mrs. Rooney lost consciousness and her vehicle continued traveling south until it veered off the road and came to rest after striking a light pole and retaining wall. Mrs. Rooney was unresponsive at the scene and was transported to a local hospital where she was pronounced dead after failing to respond to resuscitation efforts.

After shooting Ms. Rooney, the Defendant continued to shoot at cars including a Buick Century being driven by David Davis. Mr. Davis, who noticed the Defendant kneeling down by the roadway holding his rifle, tried to take evasion action by making a sharp left turn to drive down a side street. As he did so, the Defendant began firing at Davis' car hitting the car several times with rounds fired from his AR-15 rifle. Mr. Davis continued to flee and ultimately his car ran off the road and became disabled.

A third vehicle, a Dodge van, occupied by Cathy and Harold Fleenor, was also fired upon by the Defendant. The van was hit three times on the passenger side of the vehicle but neither Mr. nor Mrs. Fleenor were hit by the gunfire. The Fleenors continued south on the parkway and later to the scene after realizing their vehicle had been fired upon.

After shooting the three vehicles, the Defendant walked to the Days Inn where he took up a position outside the motel lobby. From his position, the Defendant could see directly into the lobby where Deborah Watts, the night clerk, was seated. The Defendant aimed his rifle at Mrs. Watts and shot her through the lobby window hitting her multiple times. Mrs. Watts sustained serious injuries that would require numerous surgeries and an extended hospital stay. Despite her injuries, Mrs. Watts was able to call 911 and give dispatchers information concerning the Defendant and his direction of travel.

After shooting Mrs. Watts, the Defendant walked to the back of O'Reillys Auto Parts, an adjacent business, where he spoke with James Collins who was making a delivery to the business. Mr. Collins, who believed the Defendant to be a security guard based upon the gear and clothing worn by the Defendant, noticed the Defendant had a military styled rifle slung over his shoulder. Mr. Collins, who had heard gunshots in the area of the Volunteer Parkway, asked the Defendant how he was doing to which the Defendant replied that he was just fine. Mr. Collins joked with the Defendant and asked him "Did you get them?" referring to the gunfire he had just heard and the Defendant replied "Yeah!" Mr. Collins observed the Defendant start walking to the front of the store as he began hearing sirens of Bristol Police Department Patrol Officers dispatched to the Days Inn as a result of numerous 911 calls including a call for assistance from Mrs. Watts, the motel clerk who the Defendant shot.

Bristol Patrol Officers Ronald Cowen, Jonathan Forbes, and their supervisor, Sargent Matthew Cousins, responded to the numerous calls of shots fired and arrived in three marked patrol cars at approximately the same time. Based upon their training, the officers did not drive directly to the Days Inn but instead pulled into the parking lot of the O'Reillys Auto Parts store and exited their vehicles. As the officers began walking in the direction of the Days Inn, Sargent Cousins noticed a number of spent rifle casings and realized that he needed to get his rifle out of his patrol car. As he walked back to his car, Cousins noticed the Defendant who had come up behind the officers and taken a position where he would be able to shoot the officers in the back.

Sargent Cousins, who observed the Defendant to be armed with a rifle as well as a pistol, demanded that the Defendant drop his weapons. Instead of complying with Cousins' order, the Defendant raised his pistol towards the officers resulting in the exchange of gunfire between the officers and the Defendant. In the exchange of gunfire, the Defendant fired his pistol numerous times at the uniformed officers. The officers all returned fire and the Defendant was shot several times.

The Defendant, who fell to the ground after being shot, was taken into custody. The officers noticed that the Defendant was wearing a tactical military styled vest and was in possession of additional ammunition, a bayonet, two pairs of handcuffs, and ammunition magazines taped together to allow the Defendant to carry additional ammunition. The officers began administering first aid to the Defendant until EMS units responded to the scene. While the Defendant was being medically treated by the officers, the Defendant told the officers "It was nothing personal. I am just tired of seeing my people killed." EMS units arrived and transported the Defendant to the hospital. While the Defendant was being medically treated, medical personnel discovered in the Defendant's clothing two additional gun clips with ammunition.

The multiple crime scenes were secured and the Tennessee Bureau of Investigation Violent Crimes Response Team from the Knoxville laboratory was dispatched to process the scene. Evidence was collected by the crime scene technicians. This evidence included twenty-three (23) spent rifle casings on the Volunteer Parkway, four (4) spent casings outside the motel lobby, and numerous spent casings in the O'Reilly's parking lot. The Defendant's AR-15 rifle was inspected and the technicians found the chamber and the magazine of the rifle to be empty. The Defendant's pistol, a .45 Highpoint pistol, was collected and inspected. The technicians found a round in the chamber of the pistol. A phone located close to where the Defendant was shot was inspected and the technicians discovered that the phone was dialed to "911" leading the investigating agents to believe the Defendant himself called 911 for the purpose of ambushing the officers upon their arrival at his location. Finally, a black backpack possessed by the Defendant was searched and over 400 various rounds of ammunition were discovered therein.

After the scene was secured, Detectives with the Bristol Tennessee Police Department prepared an application for a search warrant of the Defendant's apartment. Upon obtaining the search warrant from a general sessions court judge, the warrant was executed and additional firearms and ammunition was found in the apartment.


On July 8, 2016, Agent Brian Fraley of the Tennessee Bureau of Investigation interviewed the Defendant at the Bristol Regional Medical Center. The interview was recorded and a transcript of the interview is attached to this statement of facts and incorporated as part of the factual basis for the acceptance of the defendant's plea. Before interviewing the Defendant, Agent Fraley advised the Defendant of his constitutional rights per the *Miranda* dictates and the Defendant indicated that he understood his rights and agreed to talk to Agent Fraley.

The Defendant told Agent Fraley that he was upset due to "having watched television concerning police officers shooting a black guy in Baton Rouge." The Defendant said he was upset over black people getting no justice and as a result, took some guns that he had recently bought and walked to the Volunteer Parkway where he shot into some cars. The Defendant stated that he had several guns and that he shot until he ran out of bullets. The Defendant alluded to the Bristol Police Officers arriving at the Days Inn and stated that he could have ambushed the officers but chose not to do since there was a black officer present. The Defendant stated that he was told by one of the white police officers to drop his gun and when he tried to reload his empty gun, he was shot by the officers.

Agent Fraley asked the Defendant if he remember shooting at cars on the Volunteer Parkway prior to the arrival of the police and the Defendant stated that he was just mad and in a blind rage. The Defendant stated that he did not shoot the truck driver parked behind O'Reillys Auto Parts but could not specifically remember shooting the clerk at the Days Inn. The Defendant stated that he really did not want to hurt anyone but the simple fact was that they, referring to police officers, were just killing people, referring to African Americans. The Defendant stated that he was upset at his black people getting killed with no justice. Agent Fraley concluded the interview and left the Defendant's hospital room.

The case was presented to the Sullivan County Grand Jury and a true bill returned on the offenses charged in this case. The evidence would show that all of the offenses committed by the Defendant occurred within the county boundaries of Sullivan County, Tennessee.

Respectfully submitted this the ____ day of December, 2016.



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DEFENDANT