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11	UNITED STATES DISTRICT COURT	
12	DISTRICT OF NEVADA	
13		
14	UNITED STATES OF AMERICA,	CRIMINAL INDICTMENT
15	Plaintiff,	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
16	v.	VIOLATIONS:
17	RICHARD SCAVONE,	18 U.S.C. § 242 – Deprivation of Rights Under Color of Law;
18	Defendant.	18 U.S.C. § 1519 – Falsification of a Document
19		
20	THE GRAND JURY CHARGES THAT:	
21	COUNT ONE (Deprivation of Rights Under Color of Law)	
22	On or about January 6, 2015, in the State and Federal District of	
23		
24	Nevada,	
- '		

## RICHARD SCAVONE,

while acting under color of law as a police officer of the Las Vegas Metropolitan Police Department, after placing A.O. in handcuffs, grabbed A.O. around the neck with his hand and threw her to the ground; struck A.O. in the forehead with an open palm; grabbed A.O. by the head and slammed her face onto the hood of his patrol vehicle; grabbed A.O. by the hair and slammed her face onto the hood of his patrol vehicle a second time; and slammed A.O. into the door of his patrol vehicle, willfully depriving A.O. of the right, protected and secured by the United States Constitution, to be free from unreasonable seizures, which includes the right to be free from the use of unreasonable force by one acting under color of law. This offense resulted in bodily injury to A.O.

All in violation of Title 18, United States Code, Section 242.

## <u>COUNT TWO</u> (Falsification of a Document)

On or about January 6, 2015, in the State and Federal District of Nevada,

## RICHARD SCAVONE,

in relation to and in contemplation of a matter that is within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, knowingly falsified a document with the intent to impede, obstruct, and influence an

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investigation and proper administration of that matter. That is, defendant **SCAVONE** falsified his use of force report about his encounter with A.O. All in violation of Title 18, United States Code, Section 1519. DATED: this 12th day of January, 2016 A TRUE BILL: /S/ FOREPERSON OF THE GRAND JURY DANIEL G. BOGDEN United States Attorney NICHOLAS D. DICKINSON PHILLIP N. SMITH, JR. Assistant United States Attorneys PATRICIA A. SUMNER Trial Attorney