

INDICTMENT

Forgery
c. 267, §1

#001
1984CR00748
Commonwealth of Massachusetts

SUFFOLK, SS

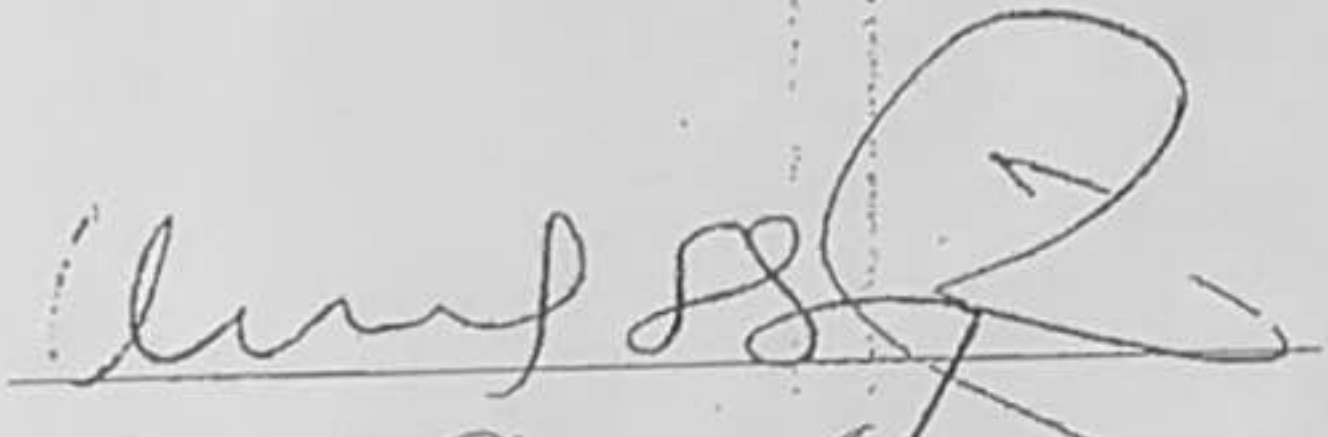
At the SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT FOR CRIMINAL BUSINESS, begun and
holden at the CITY OF BOSTON, within and for the County of Suffolk, on the first Monday of December in the year of
our Lord two thousand nineteen

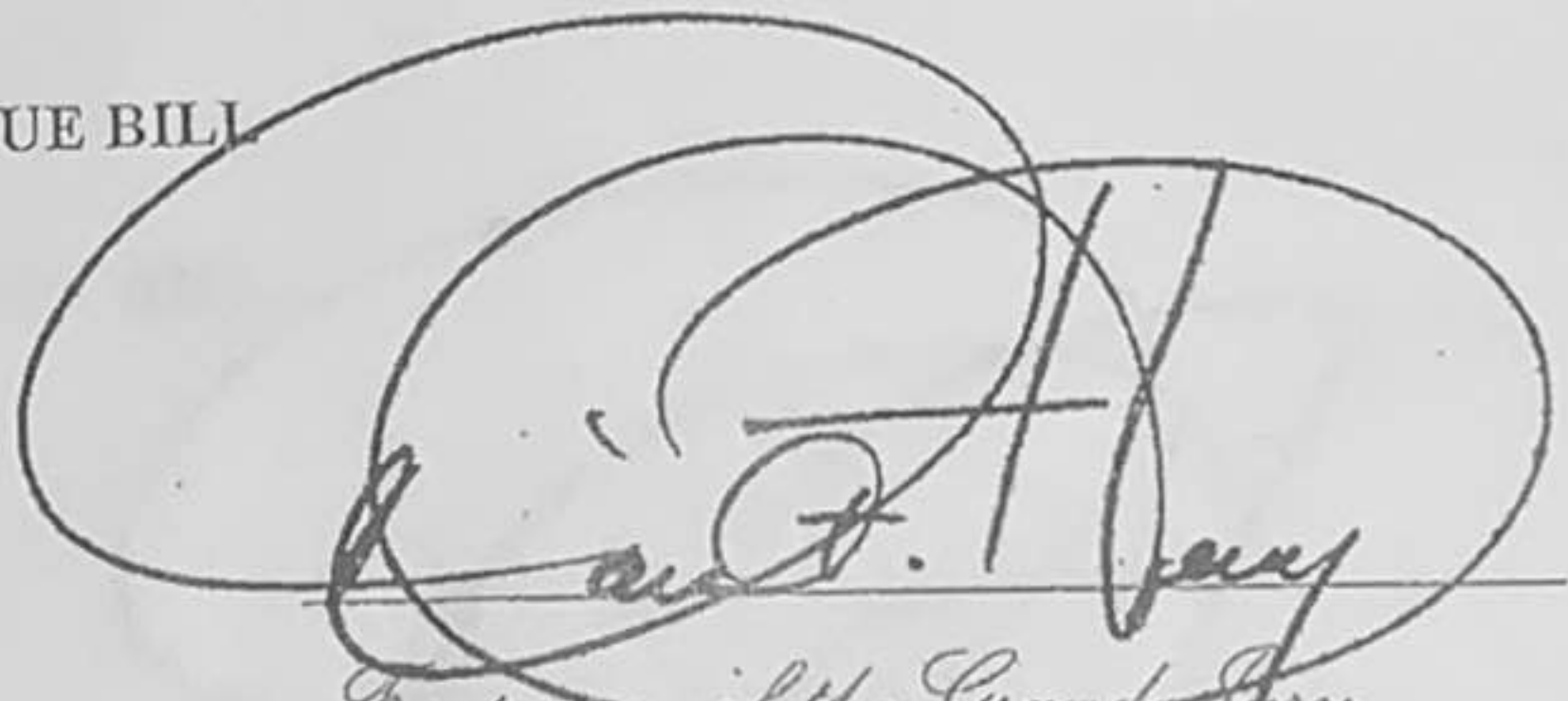
THE JURORS for the COMMONWEALTH OF MASSACHUSETTS on their oath present that

CHRISTOPHER CURTIS

on or about March 1, 2019, in South Boston, in the County of Suffolk, with intent to injure or defraud,
did falsely make, alter, forge, or counterfeit a public record, to wit: traffic citation purporting to be from
Massachusetts State Police, in violation of G.L. c.267, §5.

A TRUE BILL


Assistant District Attorney


Foreperson of the Grand Jury

Superior Court Department — Criminal Business DEC 17 2019 December Sitting, 2019

Returned into said Superior Court by the Grand Jurors and ordered to be filed.


Clerk of Court

INDICTMENT

Uttering
c. 267, §5

#002

1984CR00748

Commonwealth of Massachusetts

SUFFOLK, SS

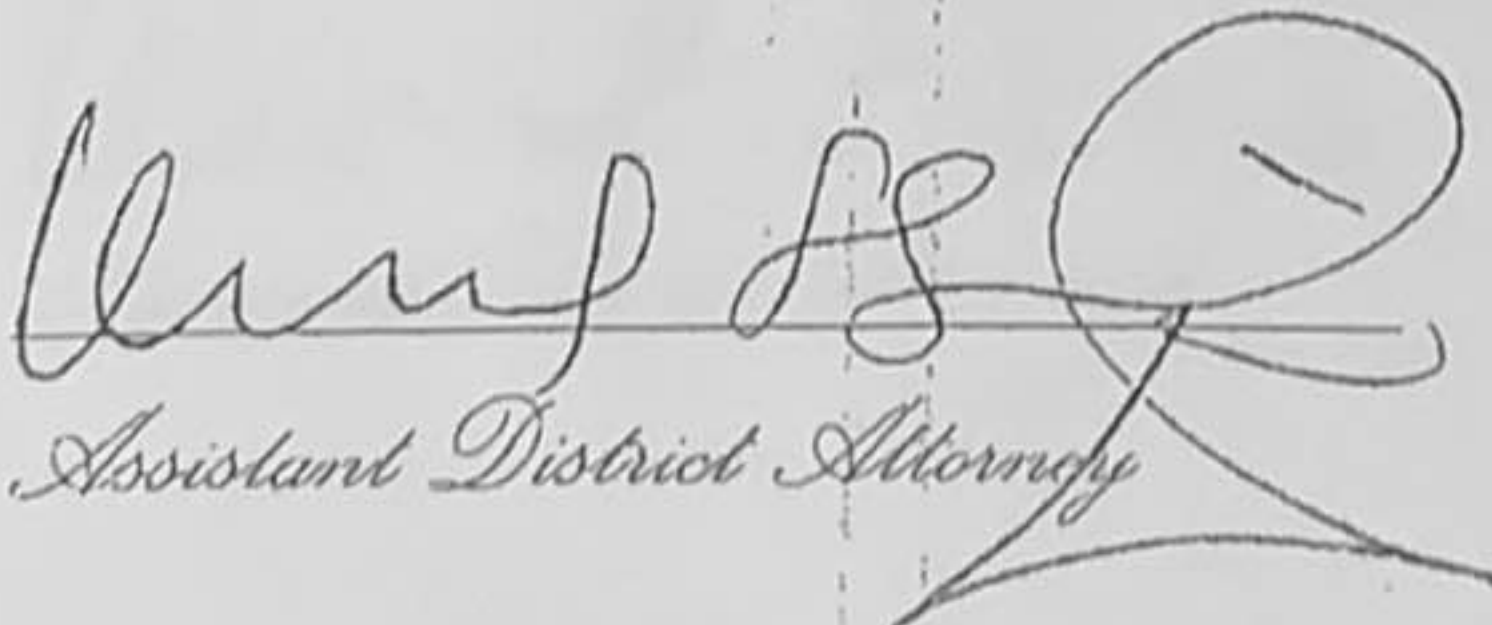
At the SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT FOR CRIMINAL BUSINESS, begun and
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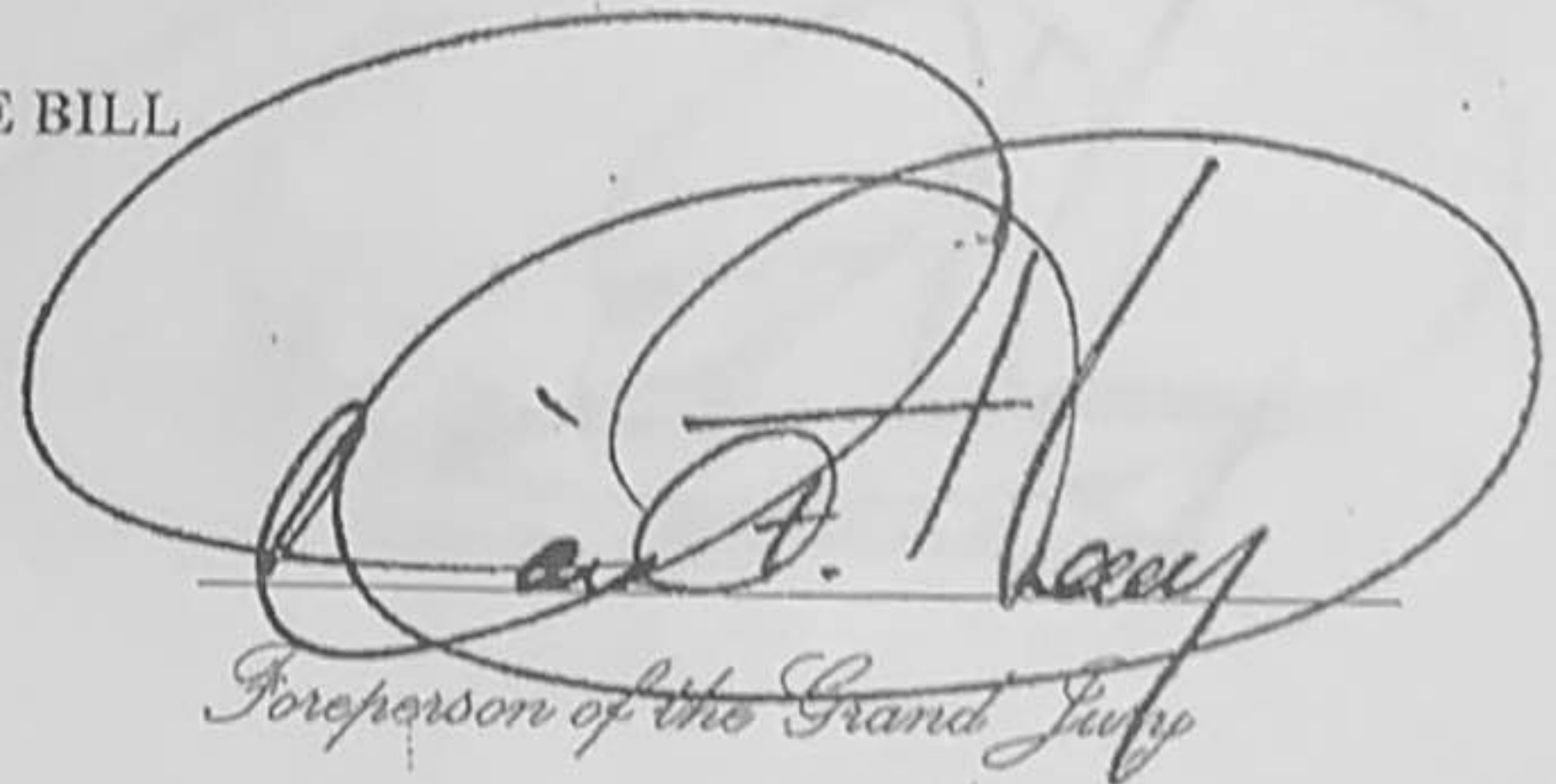
THE JURORS for the COMMONWEALTH OF MASSACHUSETTS on their oath present that

CHRISTOPHER CURTIS

On March 1, 2019, in South Boston, in the county of Suffolk, with intent to injure or defraud, did utter and publish as
true a false, forged or altered public record, to wit: traffic citation purporting to be from the Massachusetts State
Police, knowing the same to be false, forged or altered.

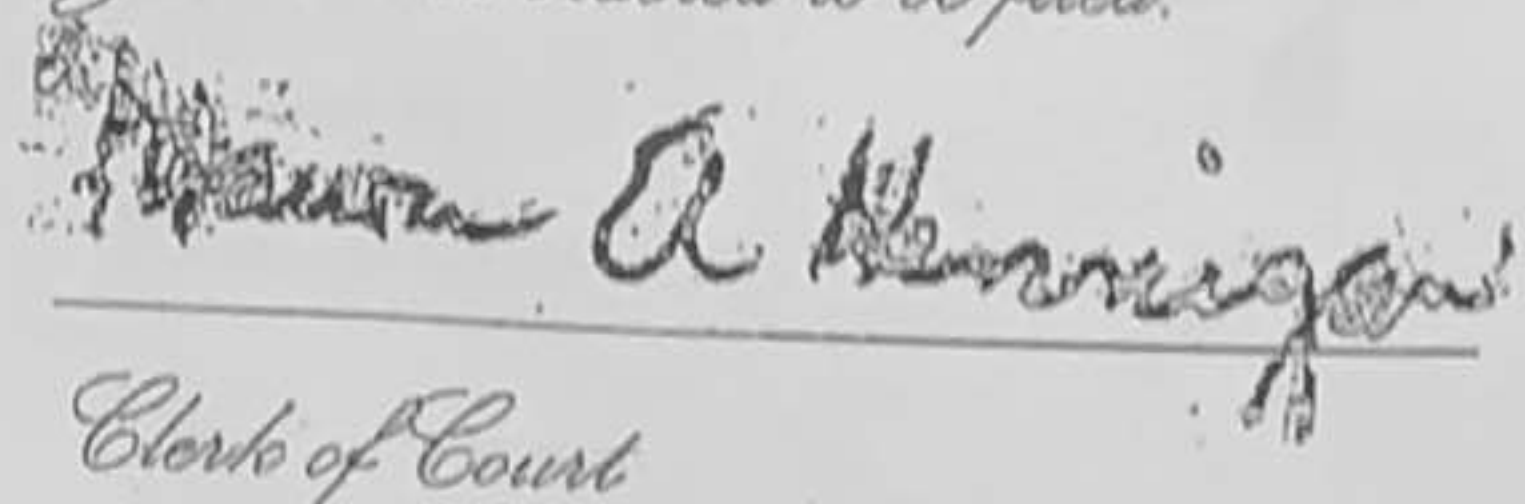
A TRUE BILL


Assistant District Attorney


Foreperson of the Grand Jury

Superior Court Department — Criminal Business DEC 17 2019 December Sitting, 2019

Returned into said Superior Court by the Grand Jurors and ordered to be filed.


Clerk of Court

INDICTMENT

#003

1984(R00748

False Report by Public Employee
c. 268, §6A

Commonwealth of Massachusetts

SUFFOLK, SS

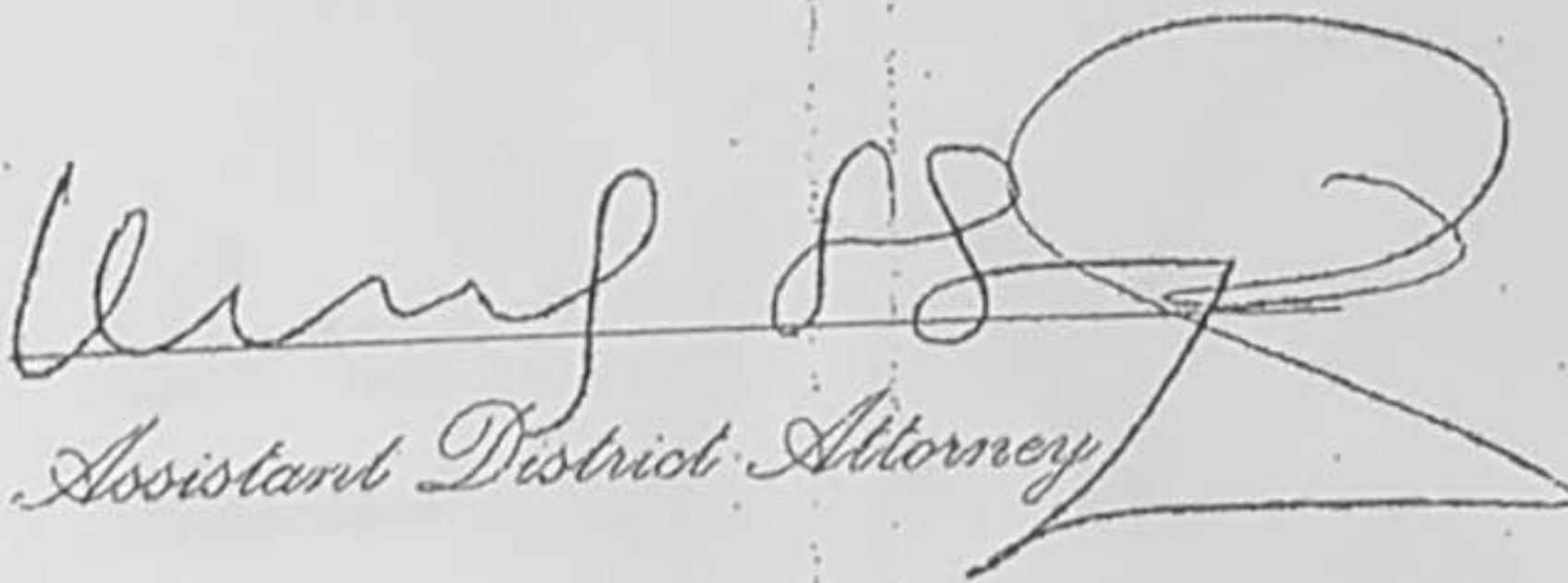
At the SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT FOR CRIMINAL BUSINESS, begun and holden at the CITY OF BOSTON, within and for the County of Suffolk, on the first Monday of December in the year of our Lord two thousand nineteen

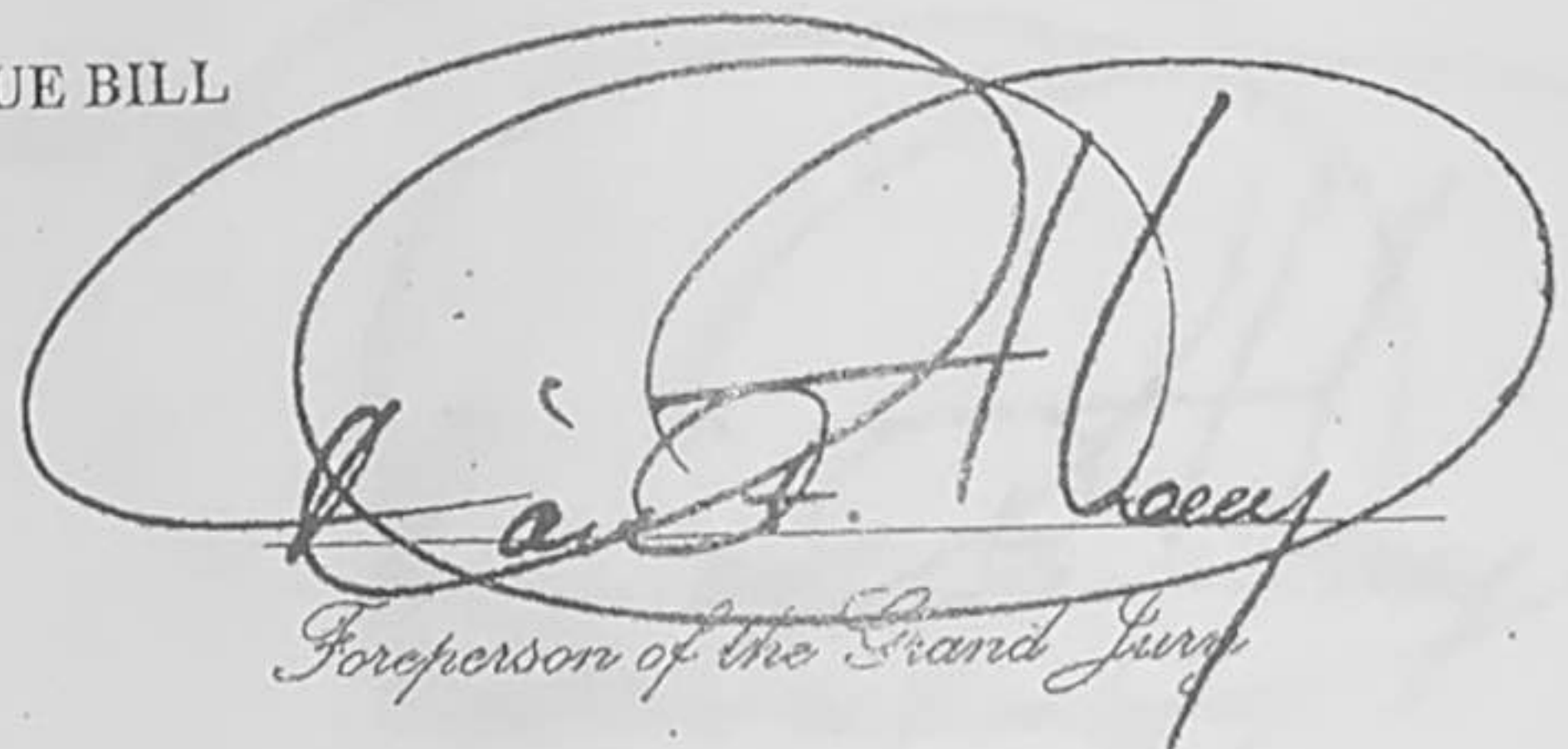
THE JURORS for the COMMONWEALTH OF MASSACHUSETTS on their oath present that

CHRISTOPHER CURTIS

On or about March 1, 2019, being an officer or employee of this Commonwealth or of a political subdivision thereof or of an authority created by the General Court, did in the course of his official duties execute, file or publish a false written report, minutes or statement, knowing the same to be false in a material matter, in violation of General Laws c. 268, § 6A, to wit: traffic citation with statement.

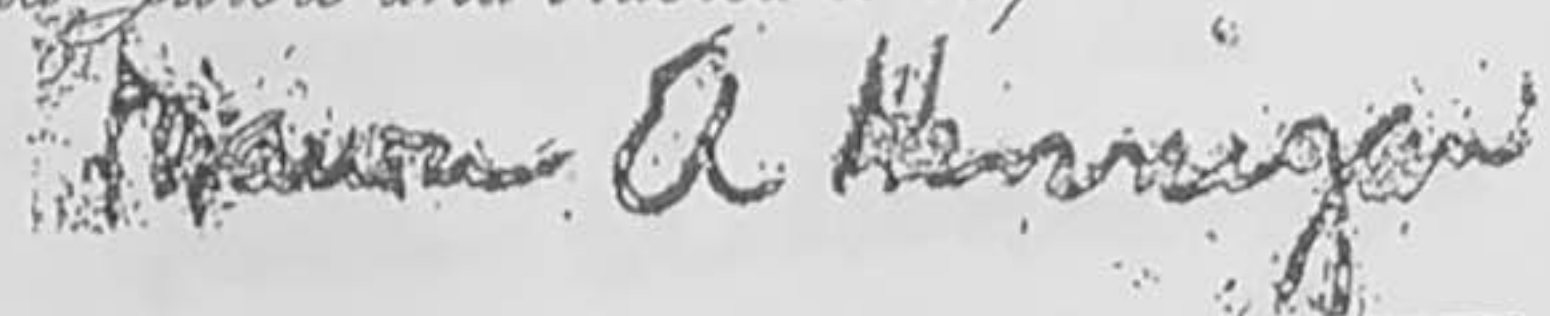
A TRUE BILL


Assistant District Attorney


Foreperson of the Grand Jury

Superior Court Department — Criminal Business DEC 17 2019 December Sitting, 2019

Returned into said Superior Court by the Grand Jurors and ordered to be filed.



Clerk of Court

INDICTMENT

Unlawfully Seeking CORI Information
c. 6, §178

#004
1984 CR 00748
Commonwealth of Massachusetts

SUFFOLK, SS

At the SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT FOR CRIMINAL BUSINESS, begun and
holden at the CITY OF BOSTON, within and for the County of Suffolk, on the first Monday of December in the year of
our Lord two thousand nineteen

THE JURORS for the COMMONWEALTH OF MASSACHUSETTS on their oath present that

CHRISTOPHER CURTIS

On or about March 1, 2019, did willfully: request, obtain or seek to obtain criminal offender record
information (CORI) under false pretenses; other than in accordance with the provisions of G.L. c.6, §168-§175, in
violation of G.L. c 6, §178.

A TRUE BILL

[Signature]
Assistant District Attorney

[Signature]
Foreperson of the Grand Jury

Superior Court Department — Criminal Business DEC 17 2019 December Sitting, 2019

Returned into said Superior Court by the Grand Jurors and ordered to be filed.

[Signature]

Clerk of Court

#003
1984(R00748
Commonwealth of Massachusetts

SUFFOLK, SS

At the SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT FOR CRIMINAL BUSINESS, begun and
holden at the CITY OF BOSTON, within and for the County of Suffolk, on the first Monday of December in the year of
our Lord two thousand nineteen

THE JURORS for the COMMONWEALTH OF MASSACHUSETTS on their oath present that

CHRISTOPHER CURTIS

on or about March 1, 2019 did willfully, directly or indirectly:

a) threaten, attempt or cause physical, emotional or economic injury or property damage to; or
or

b) mislead, intimidate or harass

another person, to wit: Gabriel Lussier, who is a:

i) witness or potential witness; or

ii) person who is or was aware of information, records, documents or objects that relate to a violation of a criminal
law, or a violation of conditions of probation, parole, bail or other court order,

with the intent to or with reckless disregard for the fact that it may impede, obstruct, delay, prevent or otherwise
interfere with a criminal investigation at any stage, a grand jury proceeding, a motion hearing, a trial, or other
criminal proceeding of any type, or a juvenile proceeding, or any other civil proceeding of any type.

A TRUE BILL

[Signature]
Assistant District Attorney

[Signature]
Foreperson of the Grand Jury

Superior Court Department — Criminal Business

DEC 17 2019

December Sitting, 2019

Returned into said Superior Court by the Grand Jurors and ordered to be filed.

[Signature]

Clerk of Court

#006

Misleading A Police Officer
c. 268, §13B

INDICTMENT

1984 CROU 748

Commonwealth of Massachusetts

SUFFOLK, SS

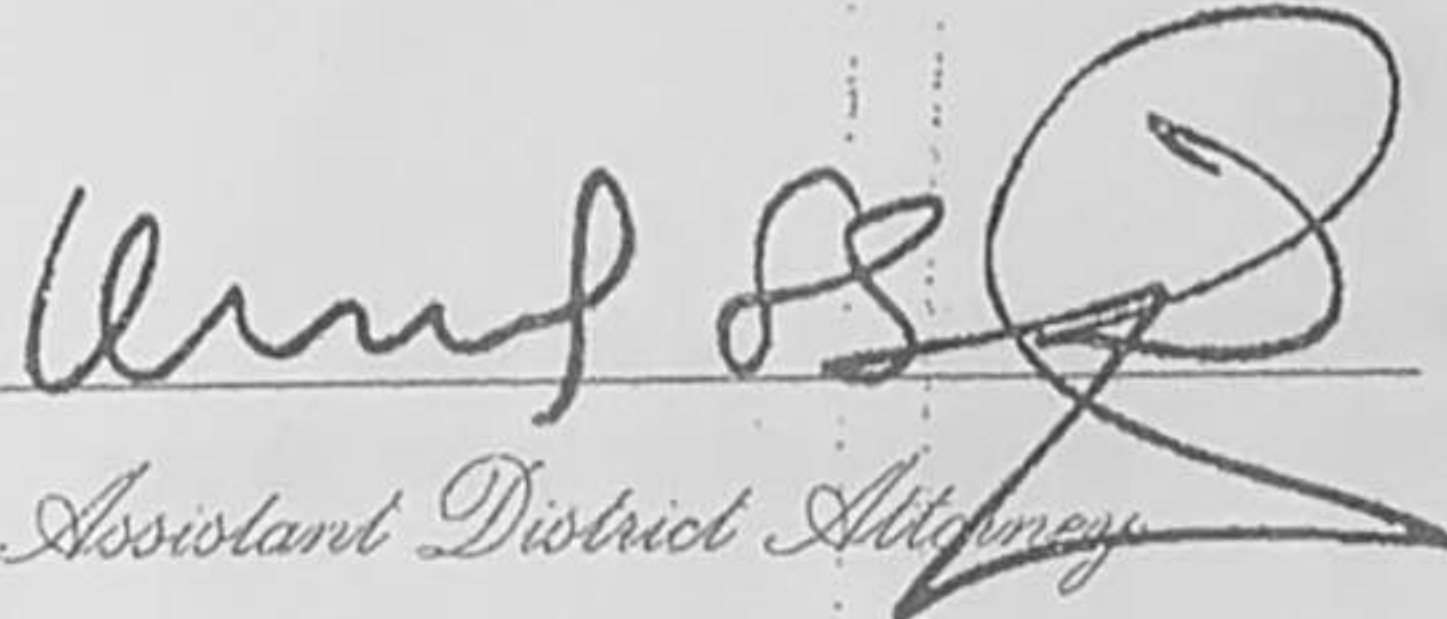
At the SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT FOR CRIMINAL BUSINESS, begun and
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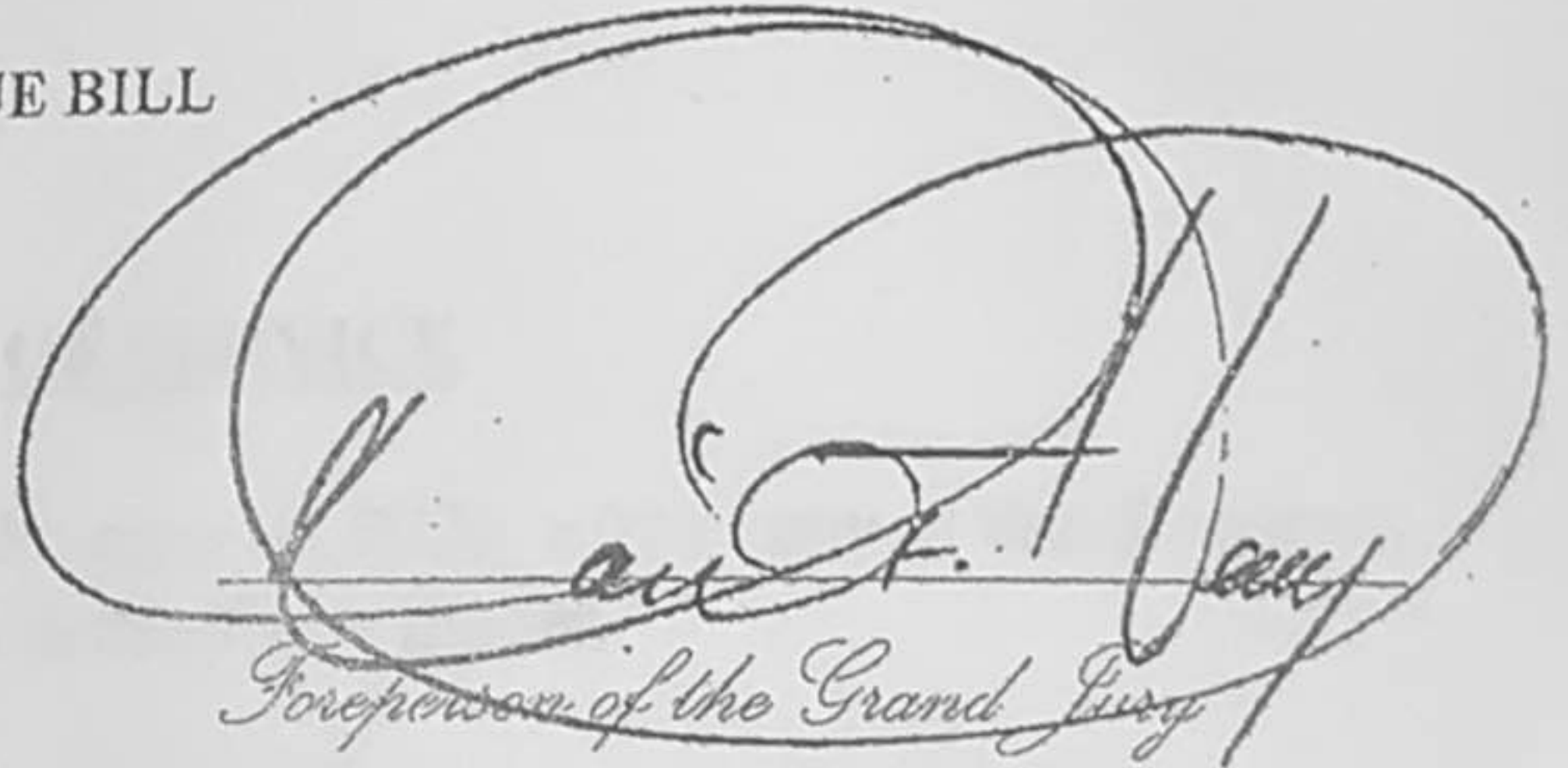
THE JURORS for the COMMONWEALTH OF MASSACHUSETTS on their oath present that

CHRISTOPHER CURTIS

On or about June 10, 2019, did willfully, directly or indirectly, mislead a police officer, to wit: Sgt. Det.
Michael Brown of the Anti-Corruption Division, with the intent to impede, obstruct, delay, prevent or otherwise
interfere with a criminal investigation at any stage, a grand jury proceeding, a trial or criminal proceeding of any
type, in violation of G.L. c. 268, §13B.


A TRUE BILL


Assistant District Attorney


Foreperson of the Grand Jury

Superior Court Department — Criminal Business DEC 17 2019 December Sitting, 2019

Returned into said Superior Court by the Grand Jurors and ordered to be filed.

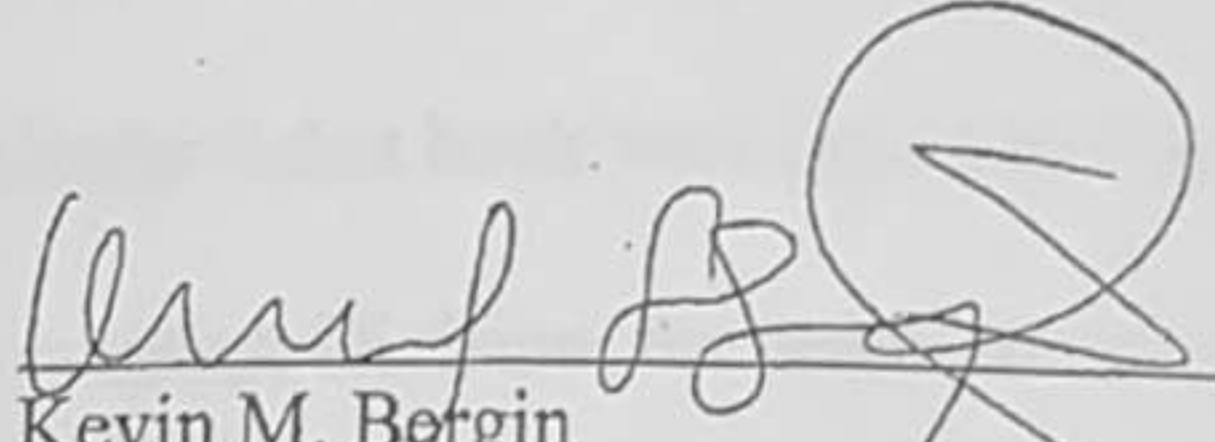

Clerk of Court

The Commonwealth reserves the right to introduce additional evidence other than that stated above that may come to its attention and possession on or before the date of trial.

Respectfully Submitted
For the Commonwealth,

RACHAEL ROLLINS,
DISTRICT ATTORNEY,

by:


Kevin M. Bergin
Assistant District Attorney
Suffolk County District Attorney's Office
One Bulfinch Place, Suite 300
Boston, MA 02114
(617) 619-4390

DATED: January 14, 2020

CERTIFICATE OF SERVICE

I, Kevin M. Bergin, hereby certify that on January 14, 2020, a true copy of this document was delivered by hand delivery to defense counsel in the above matter.

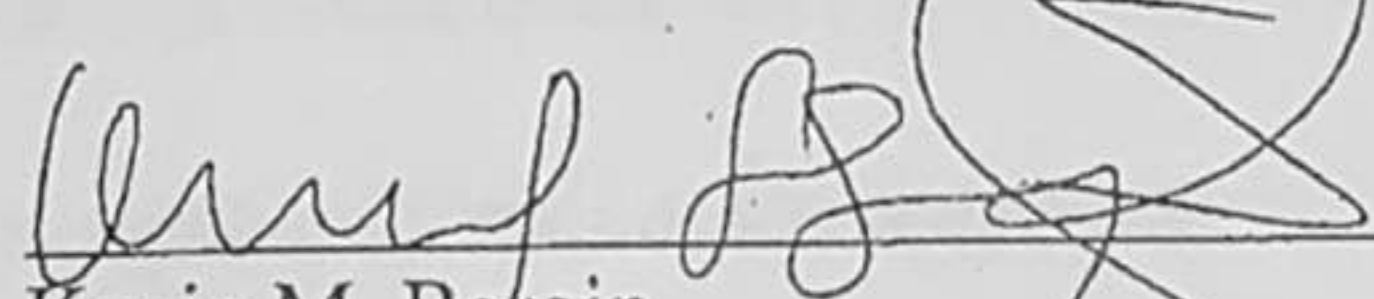

Kevin M. Bergin

The Commonwealth reserves the right to introduce additional evidence other than that stated above that may come to its attention and possession on or before the date of trial.

Respectfully Submitted
For the Commonwealth,

RACHAEL ROLLINS,
DISTRICT ATTORNEY,

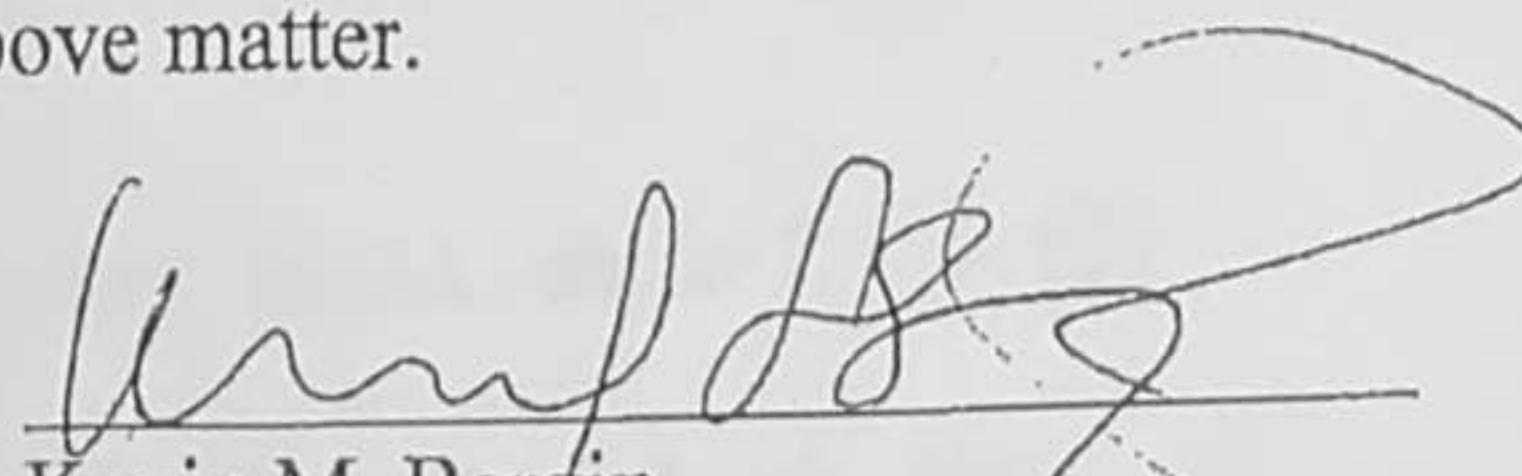
by:


Kevin M. Bergin
Assistant District Attorney
Suffolk County District Attorney's Office
One Bulfinch Place, Suite 300
Boston, MA 02114
(617) 619-4390

DATED: January 14, 2020

CERTIFICATE OF SERVICE

I, Kevin M. Bergin, hereby certify that on January 14, 2020, a true copy of this document was delivered by hand delivery to defense counsel in the above matter.


Kevin M. Bergin

In his initial interview, Officer Curtis lied to investigators and denied any knowledge of this ticket or ever being on I-93S. Further investigation, however, increasingly pointed to Curtis as the responsible party. Cell Site Location Information placed him on 93S in the approximate time period of this road rage incident. Detectives learned that the defendant owned 2014 white Toyota Tundra, and received insurance records showing that it had a damaged front grill. Further, all of the citations filed at C-6 from this particular ticket book were issued by Curtis.

During his second interview with the Anti-Corruption Division, the defendant affirmed that all of his previous answers were truthful. When confronted with evidence from the investigation, however, he "remember[ed] completely" and became absurd in his explanations. He described a different version of events on March 1st, and acknowledged later querying the victim's information through CJIS while on duty. The defendant admitted to writing the ticket, using a fake officer identification number, scribbling a signature, and mailing it to the victim while destroying the other copies. While he also admitted to writing the menacing note, the defendant claimed he did not intend to mail it with the ticket; it was meant to be a joke sent to another officer with a gift card.

Based on his actions, Curtis was indicted for (1) Forgery, M.G.L. ch. 267, s. 1; (2) Uttering, M.G.L. ch. 267, s. 5; (3) False Report by a Public Employee, M.G.L. ch. 268, s. 6A; (4) Witness Intimidation, M.G.L. ch. 268, s. 13B(b); (5) Misleading an Investigation, M.G.L. ch. 268, s. 13B(b), and; (5) Unlawfully Obtaining CORI, M.G.L. ch. 6, s. 178.

* * *

operator, he remembered that the Tundra had a damaged/missing front grill. After roughly 10 minutes, the altercation ended abruptly when the truck took an exit before entering the City of Boston.

A week later, the victim received a traffic citation in the mail inside of an envelope bearing the Boston Police Department Logo. It cited the victim \$790 for several violations, and included the following handwritten note:

WATCHED YOU GO IN
AND OUT OF TRAFFIC,
TRIED PUSHING MY TRUCK
OFF THE ROAD JUST TO
GET INTO THE LEFT LANE
CLOCKED YOU GOING OVER 90
IN A 65. I HAVE A 6 MIN
VIDEO OF YOU DRIVING LIKE AN
ASS HAT, AND PULLED UP NEXT
TO YOU AND TOOK YOUR PICTURE,
TRY FIGHTING THIS... I DARE YOU!

What happens when you
try and run an officers
truck off the road on 90s
Hope it was worth it.
SEE YOU IN COURT

After the victim appealed the ticket to Woburn District Court, court personnel noticed irregularities with the ticket and alerted the State Police who, in turn, referred the matter to the Boston Police Anti-Corruption Division. First, the citation had an illegible signature and an untraceable officer identification number. Further, the ticket listed "State" in the agency code box, making it appear that it was issued by a State Police trooper. This particular citation, however, came from a ticket book signed out by Officer Curtis, and it was determined that Curtis queried the victim's plate through CJIS at 21:47 on the night of the incident when he was working the C-6 Last Half Shift.

4

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT
DOCKET NO. 1984CR000748

COMMONWEALTH

v.

CHRISTOPHER CURTIS

COMMONWEALTH'S STATEMENT OF THE CASE

Now comes the Commonwealth in the above-captioned matter and, for the purposes of the Court's edification only, respectfully files the following Statement of the Case:

Defendant Christopher Curtis has been a police officer with the City of Boston since 2017. Following an off-duty road rage incident in Middlesex County on March 1, 2019, he later used his CJIS access to query the victim's information, forged a traffic citation purporting to be from the State Police, and mailed it to the victim with a menacing note provoking him to challenge the ticket. Officer Curtis lied to detectives during an initial interview, but later admitted to forging and sending the ticket to the victim, offering nonsensical explanations for his actions.

* * *

On March 1, 2019, the victim was driving on Interstate 93 South shortly north of Boston when, somewhere in the vicinity of Stoneham, a white Toyota Tundra approached his vehicle from behind and came dangerously close to his rear bumper. This Tundra continually honked its horn and accelerated towards the victim's vehicle before veering into the adjacent right lane and merging towards the victim. This forced the victim's vehicle halfway over the pavement grooving and within inches of the median barrier. Although the victim could not see the

JAN 14 2020



1984CR00748 Commonwealth vs. Curtis, Christopher M.

CASE TYPE:	Indictment	FILE DATE:	12/17/2019
ACTION CODE:	267/1/A-0	CASE TRACK:	
DESCRIPTION:	FORGERY OF DOCUMENT c267 §1	CASE STATUS:	Open
CASE DISPOSITION DATE	01/14/2020	STATUS DATE :	01/14/2020
CASE DISPOSITION:	Active	CASE SESSION:	Magistrate's Session
CASE JUDGE:			

PARTIES

Prosecutor Suffolk County District Attorney One Bulfinch Place Boston, MA 02114	Attorney Kevin Bergin Suffolk County District Attorney's Office Suffolk County District Attorney's Office 1 Bulfinch Pl Boston, MA 02114 Work Phone (617) 619-4000 Added Date: 12/17/2019	697437
Defendant Curtis, Christopher M. 25 Fairview Street Roslindale, MA 02131	Private Counsel Robert Michael Griffin Dhar Law LLP Dhar Law LLP One Constitution Center Suite 300 Charlestown, MA 02129 Work Phone (617) 880-6155 Added Date: 01/14/2020	553893