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1 2 3 4 5 6 7 8 9	DANIEL G. BOGDEN United States Attorney NICHOLAS D. DICKINSON PHILLIP N. SMITH, JR. Assistant United States Attorneys 333 Las Vegas Blvd. South, Suite 500 Las Vegas, Nevada 89101 PHONE: (702) 388-6336 FAX: (702) 388-6418 VANITA GUPTA Principal Deputy Assistant Attorney Civil Rights Division PATRICIA A. SUMNER Trial Attorney 601 D Street NW, 5th Floor Washington, D.C. 20530 PHONE: (202)-616-4719	
10 11	UNITED STATES DISTRICT COURT	
11	DISTRICT OF NEVADA	
13		
14	UNITED STATES OF AMERICA,	) CRIMINAL INDICTMENT
15	Plaintiff,	) 2:16-CR
16	ν.	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:	
20	COUNT ONE	
21	(Deprivation of Rights Under Color of Law)	
22	On or about January 6, 2015, in the State and Federal District of	
23	Nevada,	
24		

## 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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1	investigation and proper administration of that matter. That is, defendant		
2	SCAVONE falsified his use of force report about his encounter with A.O.		
3	All in violation of Title 18, United States Code, Section 1519.		
4			
5	DATED: this 12 <sup>th</sup> day of January, 2016		
6	A TRUE BILL:		
7			
8	/8/		
9	FOREPERSON OF THE GRAND JURY		
10	DANIEL G. BOGDEN		
11	United States Attorney		
12	Auf And		
13	NICHOLAS D. DICKINSON PHILLIP N. SMITH, JR.		
14	Assistant United States Attorneys PATRICIA A. SUMNER		
15	Trial Attorney		
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