

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA     )  
                                          )  
                                          )     No.  
                                          )  
                                          )     Violations: Title 18, United States  
ALDO BROWN                        )  
                                          )     Code, Sections 242 and 1519  
                                          )

**COUNT ONE**

The SPECIAL JANUARY 2014 GRAND JURY charges:

1. At times material to this Indictment:

(a) Defendant ALDO BROWN was employed as a sworn law enforcement officer with the Chicago Police Department.

(b) Victim A was a resident of Chicago, Illinois.

(c) On or about September 27, 2012, defendant ALDO BROWN and Officer A entered a convenience store located on East 76<sup>th</sup> Street in Chicago, Illinois. When they arrived, the officers placed certain individuals inside of the convenience store in handcuffs, including Victim A. Defendant ALDO BROWN and Officer A then began searching the store and the individuals inside.

(d) Shortly after Officer A removed the handcuffs from Victim A, defendant ALDO BROWN struck Victim A multiple times.

(e) At a time when Victim A was lying face down on the floor of the convenience store, again in handcuffs, defendant ALDO BROWN recovered a firearm from Victim A's rear pants pocket.

(f) After the recovery of the firearm and while Victim A was still

handcuffed and lying face down on the floor of the convenience store, defendant ALDO BROWN kicked Victim A.

(g) Defendant ALDO BROWN and Officer A arrested Victim A.

2. On or about September 27, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ALDO BROWN,

defendant herein, acting under color of law, willfully subjected Victim A to the deprivation of rights secured and protected by the Constitution and laws of the United States, specifically the right to be free from unlawful seizures protected by the Fourth and Fourteenth Amendments, and the right to be free from the use of unreasonable force protected by the Fourth and Fourteenth Amendments, by such acts that included punching and kicking and resulted in bodily injury to Victim A;

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

**COUNT TWO**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this Indictment are incorporated here.

2. On or about September 27, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ALDO BROWN,

defendant herein, with intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department or agency of the United States, namely, the Federal Bureau of Investigation, and in relation to and contemplation of such a matter, did knowingly falsify and make a false entry in a record, document, and tangible object, namely, a Chicago Police Department tactical response report under event number 1227108076, which contained false statements including that Victim A was an “active resister,” who “fled” and “pulled away,” and which did not indicate that defendant punched and kicked Victim A when defendant knew that Victim A did not actively resist, attempt to flee the situation, or pull away from defendant and that defendant punched and kicked Victim A;

All in violation of Title 18, United States Code, Section 1519.

**COUNT THREE**

The SPECIAL JANUARY 2014 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this Indictment are incorporated here.

2. On or about September 27, 2012, at Chicago, in the Northern District of Illinois, Eastern Division,

ALDO BROWN,

defendant herein, with intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department or agency of the United States, namely, the Federal Bureau of Investigation, and in relation to and contemplation of such a matter, did knowingly falsify and make a false entry in a record, document, and tangible object, namely, a Chicago Police Department arrest report under event number 1227108076, which falsely stated, in part, that:

P.O. Brown approached the above subject to conduct a field interview at which time the above subject stated to P.O. Brown, "I got some weed on me" and reached toward his rear pants pocket at which time P.O. Brown observed a handgun inside the above subject rear pants pocket. P.O. Brown conducted an emergency take down for officer safety and recovered the gun from the above subject rear pants pocket. The above subject was trying to pull away from P.O. Brown at which time P.O. Brown delivered an open hand stun to gain control of the above subject...

when defendant knew that the arrest report was false for multiple reasons, including:

(a) defendant ALDO BROWN did not observe a firearm on Victim A

at the time of a field interview;

(b) defendant ALDO BROWN did not know that Victim A had a firearm in his possession until after defendant ALDO BROWN struck Victim A multiple times, handcuffed him for a second time, and Victim A was lying on the floor of the convenience store; and

(c) Victim A did not pull away from defendant ALDO BROWN as indicated in the arrest report;

All in violation of Title 18, United States Code, Section 1519.

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY